

CULLEN AND DYKMAN LLP  
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(516) 357-3700

*Attorneys for The College of Saint Rose*

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF NEW YORK

In re:

THE COLLEGE OF SAINT ROSE,

Debtor.

Chapter 11

Case No. 24-11131 (REL)

**FEE APPLICATION SUMMARY SHEET**

**FIRST INTERIM APPLICATION FOR ALLOWANCE OF COMPENSATION  
FOR PROFESSIONAL SERVICES RENDERED AND REIMBURSEMENT  
OF EXPENSES INCURRED BY CULLEN AND DYKMAN LLP AS COUNSEL  
TO THE COLLEGE OF SAINT ROSE FOR THE PERIOD FROM  
OCTOBER 10, 2024 THROUGH AND INCLUDING JANUARY 31, 2025**

Name of Applicant:	Cullen and Dykman LLP
Name of Client:	The College of Saint Rose
Authorized to Provide Professional Services as:	Counsel to The College of Saint Rose
Petition Date:	October 10, 2024
Date of Retention:	November 4, 2024, <i>nunc pro tunc</i> to October 20, 2024
Date of Order Approving Employment:	November 4, 2024
Blended Rate in this Application for all Timekeepers:	\$599.16

Period for which Compensation and  
Expense Reimbursement is Requested: October 10, 2024 to January 31, 2025

Total Requested Interim Compensation: \$584,660.50

Total Requested Expense Reimbursement: \$10,177.23

Compensation Sought in this Application \$379,229.20  
Already Paid Pursuant to a Monthly  
Compensation Order but not yet Allowed:

Expenses Sought in this Application \$7,970.69  
Already Paid Pursuant to a Monthly  
Compensation Order but not yet Allowed:

Number of Professionals Included in 15  
this Application:

Total Compensation and Expenses Previously  
Requested: \$0.00

Total Compensation and Expenses Previously  
Awarded: \$0.00

Name, Billing Rate, and Department of  
Attorneys Included in this Application: See Exhibit E

Total Hours: 975.8

This is a first interim fee application.

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THE COLLEGE OF SAINT ROSE FOR THE PERIOD FROM  
OCTOBER 10, 2024 THROUGH AND INCLUDING JANUARY 31, 2025**

Cullen and Dykman LLP ("C&D"), bankruptcy counsel to The College of Saint Rose, the above-captioned debtor and debtor-in-possession (the "Debtor"), hereby submits this first interim application (the "First Interim Application") seeking entry of an order, substantially in the form attached hereto as Exhibit A, granting allowance of compensation and reimbursement of expenses pursuant to sections 328, 330 and 331 of chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), Rule 2016-1 of the Local Bankruptcy Rules for the Northern District of New York (the "Local Rules"), and the *United States Trustee's Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330*

(the “Fee Guidelines”), and the Court’s *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief* (the “Compensation Procedures Order” at Dkt. No. 123), seeking allowance and payment of fees in the amount of \$584,660.50 and reimbursement of expenses in the amount of \$10,177.23 for services rendered and expenses incurred during the period from October 10, 2024 through January 31, 2025, for which no prior application has been considered by this Court (the “First Application Period”). In support of the First Interim Application, C&D respectfully represents as follows:

**Preliminary Statement**

During the First Application Period, C&D has expended considerable amounts of time, effort, and resources assisting the Debtor’s efforts to, among other things, (a) obtain interim and final Court approval of the relief requested in the first day motions filed with the Court; (b) prepare and file with the Court the Debtor’s schedules, statements of financial affairs and monthly operating reports and prepare for attendance at the 341 meeting of creditors; (c) prepare and obtain approval of an order authorizing debtor in possession financing and use of cash collateral; (d) prepare and obtain approval of bidding procedures for the sale of the Debtor’s Campus in Albany, New York; (e) Assist with the marketing of the Campus and conduct the auction sale, prepare the purchase agreement for such sale, approval of the sale and approval of the results of the auction sale; (f) assist the Debtor with a myriad of Department of Education and Attorney General matters; (g) assist the Debtor in connection with issues regarding its endowments and pension plan; (h) prepare and obtain approval of various motions; and (h) assist the Debtor with various administrative matters in its case.

C&D respectfully submits that its dedicated efforts during the First Application Period

have provided a substantial benefit to the Debtor's estate. Therefore, C&D respectfully requests that this First Interim Application be approved in its entirety, subject to any holdback deemed appropriate by the Court, and that payment of any unpaid fees be made to C&D, subject to the terms of the Orders entered by the Court approving Debtor-in-Possession financing (the "DIP Order") and the budgets in connection therewith (the "Budget").

### **Jurisdiction**

1. The Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b). The statutory predicates for the relief requested herein are sections 328, 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, Local Rule 2016-1, and the Fee Guidelines.

### **Background**

2. On October 10, 2024 (the "Petition Date"), the Debtor filed a voluntary petition for relief pursuant to chapter 11 of the Bankruptcy Code.

3. The Debtor has remained in possession of its property and continues in the operation and management of its business as a debtor-in-possession pursuant to sections 1107 and 1108 of the Bankruptcy Code.

4. No official committee of unsecured creditors (the "Committee") has been appointed by the Office of the United States Trustee for Region 2 (the "U.S. Trustee") in this chapter 11 case.

5. Simultaneously with the filing of its petition, the Debtor filed the Declaration of Marcia J. White (the "First Day Declaration") pursuant to Local Rule 2015-2. A more detailed factual background of the Debtor's business and operations, as well as the events leading to the

filing of this chapter 11 case, is more fully set forth in the First Day Declaration, the contents of which are incorporated herein by reference.

6. On October 10, 2024, the Debtor filed an application with the Court to employ C&D as its bankruptcy counsel, which application was approved by the Court on November 4, 2024, *nunc pro tunc* as of the Petition Date. As set forth therein, C&D requests compensation on an hourly basis. Prior to the Petition Date, C&D received a \$25,000.00 retainer. A true and correct copy of the Order approving the employment and retention of C&D as counsel to the Debtor is attached hereto as **Exhibit B**. The retainer has not been applied to the amounts paid to C&D as described herein, and it is C&D's intent to apply it at the time of final fee application.

7. On November 14, 2024, the Court entered the Compensation Procedures Order which authorizes the filing of interim fee applications at certain intervals.

8. C&D now submits its First Interim Application requesting approval of professional fees in the amount of \$584,660.50 and reimbursement of expenses in the amount of \$10,177.23 for services rendered and expenses incurred during the First Application Period. This is the Debtor's first request for compensation and reimbursement of expenses in this case. The Debtor Officer has been provided with the First Interim Application and has approved its contents.

9. As set forth in the certification of Matthew G. Roseman, Esq. dated February 18, 2025 (the "Roseman Certification"), attached hereto as **Exhibit C**, this First Interim Application complies with the Bankruptcy Code, the Bankruptcy Rules, the Local Rules and the Fee Guidelines.

10. C&D discussed its rates, fees and staffing with the Debtor at the outset of this case. Further, C&D provided the Debtor with a fee budget in connection with the Debtor's

filing of this chapter 11 case, is more fully set forth in the First Day Declaration, the contents of which are incorporated herein by reference.

6. On October 10, 2024, the Debtor filed an application with the Court to employ C&D as its bankruptcy counsel, which application was approved by the Court on November 4, 2024, *nunc pro tunc* as of the Petition Date. As set forth therein, C&D requests compensation on an hourly basis. Prior to the Petition Date, C&D received a \$25,000.00 retainer. A true and correct copy of the Order approving the employment and retention of C&D as counsel to the Debtor is attached hereto as Exhibit B. The retainer has not been applied to the amounts paid to C&D as described herein, and it is C&D's intent to apply it at the time of final fee application.

7. On November 14, 2024, the Court entered the Compensation Procedures Order which authorizes the filing of interim fee applications at certain intervals.

8. C&D now submits its First Interim Application requesting approval of professional fees in the amount of \$584,660.50 and reimbursement of expenses in the amount of \$10,177.23 for services rendered and expenses incurred during the First Application Period. This is the Debtor's first request for compensation and reimbursement of expenses in this case. The Debtor Officer has been provided with the First Interim Application and has approved its contents.

9. As set forth in the certification of Matthew G. Roseman, Esq. dated February \_\_\_\_\_, 2025 (the "Roseman Certification"), attached hereto as Exhibit C, this First Interim Application complies with the Bankruptcy Code, the Bankruptcy Rules, the Local Rules and the Fee Guidelines.

10. C&D discussed its rates, fees and staffing with the Debtor at the outset of this case. Further, C&D provided the Debtor with a fee budget in connection with the Debtor's

chapter 11 case. Attorneys assigned to this matter were necessary to assist with the prosecution of the Debtor's chapter 11 case, preservation of the Debtor's assets, and other matters described herein.

11. In accordance with section 504 of the Bankruptcy Code and Rule 2016 of the Bankruptcy Rules, no agreement or understanding exists between C&D and any other person for the sharing of compensation received or to be received for services rendered in or in connection with this case.

12. No agreement or understanding prohibited by 18 U.S.C. § 155 has been or will be made by C&D.

13. On February 5, 2025, the Court extended the Debtor's exclusivity period to file a plan through March 24, 2025. The Debtor intends to file Chapter 11 Plan and Disclosure Statement by that date.

14. The Debtor is current on the payment of quarterly fees to the U.S. Trustee and has filed all monthly operating reports that are due for the post-petition period.

15. As of January 31, 2025, the Debtor had cash on hand or on deposit and securities in the amount of \$27,817,861.67<sup>1</sup> and accrued and unpaid administrative expenses in the amount of approximately \$455,709.24<sup>2</sup>. The amount of unencumbered estate funds has not yet been determined.

#### **Summary of Services Rendered**

16. As more fully described herein, C&D has provided substantial legal services to the Debtor during the First Application Period. Pursuant to the Fee Guidelines, a summary of the total time expended and amount of compensation sought for each of the project categories is

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<sup>1</sup> A significant portion of this amount is restricted.

<sup>2</sup> In addition to the known accrued professional fee amounts set forth herein, the Debtor has certain trade payables



attached hereto as Exhibit D. A listing of the name, title, practice group, and first year of bar admission, if applicable, for each professional person who rendered services to the Debtor, along with a summary of the total hours billed and total amount of billing for each professional, is attached hereto as Exhibit E. Attached hereto as Exhibit F is a detailed computer-generated summary of the time expended by each professional and the services rendered by C&D as counsel to the Debtor in each category during the First Application Period. Indicated below are each category and the compensation sought by C&D for services performed on the Debtor's behalf in each category:

1. General Administration	\$108,218.00
2. Cash Collateral and Debtor in Possession Financing	\$30,323.50
3. Asset Disposition, Sale or Restructuring	\$190,327.00
4. Resolution of Creditor Issues	\$8,759.50
5. Claims Objection/Resolutions	\$2,093.50
6. Plan and Disclosure Statement	\$13,448.50
7. Leases and Executory Contracts	\$435.00
8. Retention of Professionals and Fee Statements	\$12,415.50
9. Preparation For/Attend Court Hearings	\$41,162.50
10. Services Related to Litigation	\$0.00
11. Non-Working Travel (Not charged)	\$0.00
12. Motion Practice	\$22,817.50
13. Operating Reports	\$3,423.00
14. Governance Issues	\$54,273.50
15. Educational/Regulatory Matters	\$6,327.50

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due and owing that are paid in the normal course of its business operations.

16. Endowment/Attorney General Matters	\$50,728.50
17. PBGC Issues	\$23,974.00
18. Employment Matters	\$11,533.00
19. Record Retention	\$4,400.50

17. During the First Application Period, C&D has expended a total of 975.8 hours in this matter for total requested compensation of \$584,660.50 at its usual and customary hourly rates. The average blended hourly rate was \$599.16.

18. During the First Application Period, C&D has incurred expenses totaling \$10,177.23. Attached hereto as **Exhibit G** is a summary of the expenses incurred during the First Application Period for which reimbursement is sought herein. Copying charges are assessed at \$.10 per copy. Reimbursement for those costs, as well as all other disbursements in this case, is sought in accordance with the applicable Local Rules.

19. C&D has set forth below a narrative of the legal services provided to the Debtor in order to inform the Court of the legal services rendered to the Debtor by C&D during the First Application Period. The summary of services performed by C&D is only intended to highlight the general categories of services provided by C&D on the Debtor's behalf. It is not intended to set forth each and every item of professional services that C&D performed for the Debtor. All of the services for which compensation is sought herein were performed for, or on behalf of, the Debtor.

**Category 1**  
**General Administration**

20. The first category of services rendered by C&D relates to those services required for the Debtor's general case administration.

21. In that regard, C&D performed extensive services relating to the Debtor's operations including as necessary to ensure the orderly transition into chapter 11 and address operational concerns.

22. C&D also assisted the Debtor in responding to inquiries and concerns of various creditors and constituencies, as well as the myriad other issues that arose within the day-to-day operations of the Debtor's business, particularly during the early stages of the chapter 11 case.

23. Services rendered by C&D in the first category of services include:

- Communications with the Court on the logistical matters with respect to the Debtor's bankruptcy filing and hearings;
- Communications with the Debtor regarding numerous operational issues and bankruptcy administration issues;
- Communications with creditors regarding the Debtor's case and the automatic stay;
- Communications regarding press inquiries and responses to same;
- Extensive review and revision, and amendment where needed, of the Debtor's Schedules, Statement of Financial Affairs, amendments to the Debtor's Schedules, matrices, and master service lists;
- Assist the Debtor in preparation for and participation in the Initial Debtor Interview;
- Preparation for and attendance at the the Section 341 meeting of creditors;
- Communications regarding the Debtor's bank accounts;
- Communications with utility providers regarding adequate assurance;
- Communications regarding audits; and
- Review of, and communications regarding, Debtor's insurance policies.

24. In rendering services relating to this category, C&D attorneys expended 158.5 hours, for requested compensation at their customary and usual hourly rates of \$108,218.00. C&D's blended hourly rate for services rendered in this category is \$682.76.

**Category 2**  
**Cash Collateral and Debtor-in-Possession Financing**

25. The second category of services relates to the Debtor's negotiation of the DIP Loan and other dealings with the Debtor's Bondholders and DIP Lender. C&D expended significant time performing services in this category.

26. Services rendered by C&D in the second category of services include the following:

- Communications with the Debtor with respect to selection of a DIP Lender and the various terms proposed;
- Negotiation of all DIP Loan documents including the DIP Loan Agreement, DIP Loan Mortgage and other ancillary documents;
- Preparation and negotiation with the DIP Lender and Bondholders of the motion to approve the DIP Loan and use of cash collateral;
- Preparation and negotiation of interim and final DIP Orders;
- Preparation and negotiation with the DIP Lender and Bondholders with respect to the DIP budget;
- Communications with the DIP Lender, Bondholders, U.S. Trustee and other parties regarding the DIP Loan and use of cash collateral;
- Preparation of closing documents with respect to the closing of the DIP Loan; and
- Correspondence with all appropriate parties with respect to the Debtor's ongoing budgets and budget variance reports.

27. In rendering services relating to this category, C&D attorneys expended 38.1 hours, for requested compensation at their customary and usual hourly rates of \$30,323.50. C&D's blended hourly rate for services rendered in this category is \$795.89.

**Category 3**  
**Asset Disposition or Sales**

28. The third category of services relates to the sale and disposition of the Debtor's assets. The considerable services performed in this category include:

- Communications with the Debtor's broker with respect to the marketing of the Debtor's Campus;
- Negotiation and preparation of the motion and order for retention of the real estate broker;
- Real estate status calls with the Debtor's broker, the Debtor, Bondholders and DIP Lender;
- Communications with numerous potential purchasers;
- Preparation of non disclosure agreements for numerous potential purchasers;
- Preparation and negotiation of the Asset Purchase Agreement and schedules thereto;
- Preparation of bidding procedures, the order to approve bidding procedures, the motion to approve bidding procedures and sale of the Debtor's Campus, and order approving the sale;
- Review and analysis of various bid packages;
- Review and communications regarding Debtor's Brokers Opinion of Value;
- Preparation for and participation in the auction sale;
- Preparation for the closing of the sales;
- Review and analysis of personal property sales vis-à-vis sale of Campus;
- Legal research in connection with sale issues;

- Preparation and negotiation of motion to sell *de minimus* assets, pianos and artwork;
- Communications regarding sales of personal property;
- Review and communications regarding title issues;
- Preparation of access agreement for Land Authority prior to closing;
- Review issues of real estate tax exemptions; and
- Communications regarding property sales.

29. In rendering services relating to this category, C&D attorneys expended 252.1 hours, for requested compensation at their customary and usual hourly rates of \$190,327.00. C&D's blended hourly rate for services rendered in this category is \$754.97.

**Category 4**  
**Resolution of Creditor Issues**

30. The fourth category of services relates to the Debtor's resolution of certain issues posed by creditors.

31. Services rendered by C&D in this category include:

- Review and communications regarding issues attendant to critical vendor;
- Communications regarding tax claims;
- Research and communications pertaining to DOL claim for unemployment; and
- Communications regarding fine imposed by State of South Carolina.

32. In rendering services relating to this category, C&D attorneys expended 12.7 hours, for requested compensation at their customary and usual hourly rates of \$8,759.50. C&D's blended hourly rate for services rendered in this category is \$689.72.

**Category 5**  
**Claims Objections/Resolutions**

33. The fifth category of services relates to C&D's evaluation and communication regarding filed claims and comparison of same to schedules.

34. In rendering services relating to this category, C&D attorneys expended 3.8 hours, for requested compensation at their customary and usual hourly rates of \$2,093.50. C&D's blended hourly rate for services rendered in this category is \$550.92.

**Category 6**  
**Plan and Disclosure Statement**

35. The sixth category of services relates to C&D's efforts in connection with its Plan and Disclosure Statement. During the First Application Period, the Debtor began the significant work needed in order to prepare the Debtor's Chapter 11 Plan and Disclosure Statement, and the waterfall for distribution of various asset buckets.

36. In rendering services relating to this category, C&D attorneys expended 16.5 hours, for requested compensation at their customary and usual hourly rates of \$13,448.50. C&D's blended hourly rate for services rendered in this category is \$815.06.

**Category 7**  
**Leases and Executory Contracts**

37. The seventh category of services relates to the Debtor's previously terminated parking lot leases.

38. In rendering services relating to this category, C&D attorneys expended .5 hours, for requested compensation at their customary and usual hourly rates of \$435.00. C&D's blended hourly rate for services rendered in this category is \$870.00.

**Category 8**  
**Retention/Professional Compensation/Fee Statements**

39. The eighth category of services provided by C&D relates to the retention of professionals in the Debtor's bankruptcy proceedings. During the First Application Period, C&D performed services for the Debtor in this category including the following:

- Preparation of application and affidavits to retain C&D as Debtor's counsel;
- Assistance in the preparation of the application to retain Nolan Heller Kauffman LLP as counsel to the Debtor's Board of Trustees;
- Assistance in the preparation of the application to retain FTI Consulting Inc. as Debtor's financial advisors;
- Preparation of motion for approval of Compensation Procedures Order;
- Communications with the Office of the United States Trustee regarding all retention applications;
- Communications with all professionals with respect to monthly fee statements;
- Preparation and filing of all C&D monthly fee statements; and
- Review and filing of monthly fee statements for all other professionals.

40. In rendering services relating to this category, C&D attorneys expended 15.2 hours, for requested compensation at their customary and usual hourly rates of \$12,415.50. C&D's blended hourly rate for services rendered in this category is \$816.81.

**Category 9**  
**Preparation For/Attend Court Hearings**

41. The ninth category of services relates to C&D's preparing for and attending hearings on the various matters related to this case.

42. C&D prepared for and attended numerous hearings on behalf of the Debtor in this case during the First Application Period, including, without limitation, hearings on:



- Motion for interim and final use of cash collateral, and approval of Debtor-in-Possession financing;
- Motion for order establishing notice procedures;
- Motion for extension of time to file schedules;
- Motion to continue insurance policies;
- Cash management motion;
- Pre-petition wage motion;
- Critical vendor motion;
- Motion for approval of Compensation Procedures Order;
- Motion to retain real estate brokers;
- Motion for approval of adequate assurance to utilities;
- Bidding procedures and sale motion for the sale of the Campus;
- Motions to sell de minimus assets, pianos and artwork;
- Motion to extend exclusivity;
- Motion to file cy pres petition;
- Motion to make payments from pension plan; and
- Motion to employ ordinary course professionals.

43. In rendering services relating to this category, C&D attorneys expended 52.3 hours, for requested compensation at their customary and usual hourly rates of \$41,162.50. C&D's blended hourly rate for services rendered in this category is \$787.05.

**Category 11**  
**Non-Working Travel**

44. The eleventh category of services relates to non-working travel time expended by C&D's attorneys during the First Application Period.

45. In rendering services relating to this category, C&D attorneys expended 97.8 hours. C&D is not charging for this time in this case.

**Category 12**  
**Motion Practice**

46. The twelfth category of services relates to C&D's efforts to prepare motions requesting various forms of relief from the Bankruptcy Court.

47. C&D spent time during the First Application Period negotiating and preparing the motions identified in Category 9. C&D also prepared and revised orders for approval of all motions and conducted research as necessary in connection with the preparations of the motions.

48. In rendering services relating to this category, C&D attorneys expended 30.6 hours, for requested compensation at their customary and usual hourly rates of \$22,817.50. C&D's blended hourly rate for services rendered in this category is \$745.67.

**Category 13**  
**Operating Reports**

49. The thirteenth category of services relates to C&D's review and filing of monthly operating reports submitted to the Bankruptcy Court and U.S. Trustee.

50. In rendering services relating to this category, C&D attorneys expended 4.2 hours, for requested compensation at their customary and usual hourly rates of \$3,423.00. C&D's blended hourly rate for services rendered in this category is \$815.00.

**Category 14**  
**Governance Issues**

51. The fourteenth category of services relates to corporate governance issues pertaining to the Debtor, including:

- Preparation for and attendance at Board of Trustee meetings and Executive Committee meetings;

- Assist in the preparation of agendas for all meetings;
- Review and communications regarding alumni association issues;
- Review issues regarding Trustee Non-Disclosure agreements;
- Preparation of necessary corporate resolutions for actions in bankruptcy case; and
- Preparation for and attendance at audit and TAG committee meetings where needed.

52. In rendering services relating to this category, C&D attorneys expended 90.5 hours, for requested compensation at their customary and usual hourly rates of \$54,273.50. C&D's blended hourly rate for services rendered in this category is \$599.82.

**Category 15**  
**Education/Regulatory Matters**

53. The fifteenth category of services relates to C&D's services to the Debtor in connection with education and regulatory matters. During the First Application Period, C&D performed services for the Debtor in this category including the following:

- Communications regarding transfer of student information and data;
- Review of information and responses to auditors' requests;
- Review of documents and communications regarding Close Out Audits;
- Review of, and communications regarding, issues of closed school discharge;
- Review and prepare response to subpoenas and other inquiries for student records;
- Reviewed HIPAA issues; and
- Communications and research with respect to revocation of charter and dissolution of the College.

54. In rendering services relating to this category, C&D attorneys expended 15.7 hours, for requested compensation at their customary and usual hourly rates of \$6,327.50. C&D's blended hourly rate for services rendered in this category is \$403.03.

**Category 16**  
**Endowment/Attorney General Matters**

55. The sixteenth category of services relates to C&D's efforts in connection with matters concerning the New York Attorney General and the Debtor's restricted endowments.

56. C&D spent time during the First Application Period in connection with this matter dealing with restrictions on endowment funds and communications with respect to the endowment funds, review of and participation in Surrogates Court proceedings regarding bequests, and review of, and communications regarding, charitable, gift annuity issues. C&D also spent considerable time preparing a cy pres petition to be filed in order to transfer the endowment funds and communicating with the New York State Attorney General's office regarding same.

57. In rendering services relating to this category, C&D attorneys expended 112.3 hours, for requested compensation at their customary and usual hourly rates of \$50,728.50. C&D's blended hourly rate for services rendered in this category is \$451.72.

**Category 17**  
**Pension Plan/ PBGC Matters**

58. The seventeenth category of services relates to matters pertaining to its pension plan and the PBGC, including:

- Review of, and communications regarding, Debtor's pension plan termination;
- Communications regarding information requested by PBGC regarding pension plan;
- Review of and assistance with communications with plan participants regarding pension plan;

- Review and analysis of regulations regarding involuntary termination of plan; and
- Preparation of motion to allow payments from pension plan and review of response of PBGC to same.

59. In rendering services relating to this category, C&D attorneys expended 45.8 hours, for requested compensation at their customary and usual hourly rates of \$23,974.00. C&D's blended hourly rate for services rendered in this category is \$523.45.

**Category 18**  
**Employment Matters**

60. This category of services relates to C&D's efforts to address various employment matters involving the Debtor and its employees including their contracts and services and compensation thereunder.

61. In rendering services relating to this category, C&D attorneys expended 22.1 hours, for requested compensation at their customary and usual hourly rates of \$11,533.00. C&D's blended hourly rate for services rendered in this category is \$521.86.

**Category 19**  
**Record Retention**

62. The final category of services relates to C&D's assistance with record retention issues in connection with the Debtor's Chapter 11 case, including communications regarding records to be retained and length of retention period and beginning the preparation of all a motion for approval of retention procedures.

63. In rendering services relating to this category, C&D attorneys expended 7.1 hours, for requested compensation at their customary and usual hourly rates of \$4,400.50. C&D's blended hourly rate for services rendered in this category is \$619.79.

### Summary of Application

64. C&D submits that compensation for the services rendered and reimbursement of expenses incurred as set forth in this First Interim Application is reasonable based on: (i) the time and labor required; (ii) the complexity of the legal questions presented; (iii) the skill required to perform the legal services; (iv) the customary compensation for bankruptcy professionals in New York; and (v) the experience and ability of the attorneys providing services. With respect to each of these standards, C&D submits that the compensation requested is reasonable and appropriate.

### Applicable Legal Standards

65. Section 330(a) of the Bankruptcy Code provides for the compensation of reasonable and necessary services rendered by professionals retained under section 327 of the Bankruptcy Code, as follows:

- (1)(A) reasonable compensation for actual, necessary services rendered by the . . . attorney and by any paraprofessional person employed by any such person; and
- (B) reimbursement for actual, necessary expenses.

\* \* \*

(3) In determining the amount of reasonable compensation to be awarded to . . . a professional person, the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including –

- (A) the time spent on such services;
- (B) the rates charged for such services;
- (C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
- (D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;

- (E) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and
- (F) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a).

66. C&D respectfully submits that the hours worked by C&D's personnel were reasonable and necessary given the numerous and oftentimes complex, novel, and intricate issues which arose during this case. Further, C&D believes that the time spent was justified by the results that have been achieved thus far.

67. The rates being charged by C&D are commensurate with those typically charged by other firms in this and surrounding Districts of New York as well as those of other nationally-recognized firms specializing in bankruptcy.

68. C&D submits that the professional services for which it seeks compensation and the expenditures for which it seeks reimbursement in this First Interim Application were necessary and appropriate for the orderly administration of the Debtor's chapter 11 case. The professional services performed by C&D preserved and protected the value of the Debtor's assets for the benefit of all parties-in-interest.

69. The services rendered were performed within a reasonable amount of time by professionals with the seniority and skill level commensurate with the complexity, importance, and nature of the problem, issue or task addressed. Whether reviewed individually as to each of the tasks described above or collectively as a whole, the professional services were performed expediently and efficiently to accomplish the needs of the Debtor in this chapter 11 case.

70. C&D submits that the compensation sought in this First Interim Application is reasonable and necessary under the applicable standards. Approval of the compensation for professional services and reimbursement of expenses sought herein is warranted. C&D therefore respectfully requests that the Court grant the First Interim Application.

#### Notice

71. Notice of this First Interim Application has been provided in accordance the Interim Compensation Order and the Order Establishing Notice Procedures entered in this case. The Debtor respectfully submits that further notice of this First Interim Application is neither required nor necessary.

#### Conclusion

72. Through C&D's efforts, the Debtor has made significant progress in its chapter 11 case to date. C&D has worked diligently during the First Application Period to help the Debtor to address a wide array of issues in this complex case. Accordingly, C&D submits that its services have provided substantial value to the Debtor's estate and requests that this First Interim Application be approved in its entirety.

**WHEREFORE**, for the reasons set forth herein, C&D respectfully requests that the Court enter an Order (a) approving C&D's interim fees in the amount of \$584,660.50 and reimbursement of expenses in the amount of \$10,177.23 in connection with this First Interim Application; (b) authorizing and directing the Debtor's payment of any of such amounts in excess of amounts paid pursuant to the Compensation Procedures Order in the ordinary course of business within five (5) business days of entry of an order approving this application, subject to the terms of the DIP Order and Budget; and (c) granting such other relief as the Court deems is just and proper.



Dated: Albany, New York  
February 18, 2025

CULLEN AND DYKMAN LLP

By: s/ Bonnie Pollack  
Matthew G. Roseman, Esq.  
Bonnie L. Pollack, Esq.  
80 State Street, Suite 900  
Albany, New York 12207  
(516) 357-3700

*Counsel for The College of Saint Rose*

CERTIFICATION

I, Marcia J. White, President of the College of Saint Rose, certify that I have reviewed the First Interim Fee Application filed by Cullen and Dykman LLP, and

Check one:

☒ I do not object to allowance of the application and payment of fees and expenses in full as the services rendered and fees charged appear reasonable; or

☐ I object to the application and to payment of the fees and expenses in full in the amounts and for the reasons set forth below:

Dated: February 18, 2025

/Marcia J. White  
Marcia J. White, President

Exhibit A

Proposed Order

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF NEW YORK

In re:

THE COLLEGE OF SAINT ROSE,

Debtor.

Chapter 11

Case No. 24-11131 (REL)

**ORDER GRANTING APPLICATIONS FOR ALLOWANCE OF INTERIM  
COMPENSATION AND REIMBURSEMENT OF EXPENSES**

Upon consideration of Applications for Allowance of Interim Compensation and Reimbursement of Expenses (the “Applications”) for professional services rendered and expenses incurred during the period commencing October 10, 2024 through January 31, 2025; and a hearing having been held before this court to consider the Applications on March 12, 2025; and notice having been given pursuant to Federal Rules of Bankruptcy Procedure 2002(a)(6) and (c)(2) and this Court’s *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief* (Dkt. No. 123); and due consideration having been given to any responses thereto; and sufficient cause having been shown therefor, it is hereby;

**ORDERED** that the Applications are granted to the extent set forth in the attached  
Schedule "A".

\*\*\*\*

**Schedule A**

**CURRENT INTERIM FEE PERIOD**  
[October 10, 2024 to January 31, 2025]

Case No.: 24-11131 (REL)  
Case Name: The College of Saint Rose

(1) Applicant	(2) Date/Doc. No. of Application	(3) Interim Fees Requested on Application	(4) Fees Allowed	(5) Fees Awarded	(6) Fees to be Paid for Current Fee Period (less amounts paid per monthly fee statements)	(7) Fees to be Paid for Prior Fee Period (if any)	(8) Total Fees to be Paid	(9) Interim Expenses Requested	(10) Expenses to be Paid for Current Fee Period (less amounts paid per monthly fee statement)
Cullen and Dykman LLP	February __, 2025 [Dkt. __]	\$584,660.50				N/A		\$10,177.23	
Nolan Heller Kauffman LLP	February __, 2025 [Dkt. __]	\$39,160.00				N/A		\$0.00	
FTI Consulting Inc.	February __, 2025 [Dkt. __]	\$302,446.10				N/A		\$2,204.73	

DATE ON WHICH ORDER WAS SIGNED: \_\_\_\_\_

INITIALS: \_\_\_\_\_ USBJ

**Exhibit B**

**Retention Order**

So Ordered.

Signed this 4 day of November, 2024.



A handwritten signature in black ink, appearing to read "R. Littlefield, Jr.", written over a horizontal line.

Robert E. Littlefield, Jr.  
United States Bankruptcy Judge

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF NEW YORK

In re:

THE COLLEGE OF SAINT ROSE,

Debtor.

x

: Chapter 11

: Case No. 24-11131 (REL)

x

**ORDER AUTHORIZING THE RETENTION OF  
CULLEN AND DYKMAN LLP AS COUNSEL TO THE DEBTOR  
EFFECTIVE AS OF THE PETITION DATE**

Upon the application dated October 10, 2024 (the "Application")<sup>1</sup> of The College of Saint Rose, the above-captioned debtor and debtor-in-possession (the "Debtor") for entry of an order, pursuant to section 327(a) of title 11 of the United States Code (the "Bankruptcy Code"), Rule 2014 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and Rule 2014-1 of the Local Bankruptcy Rules for the Northern District of New York (the "Local Rules"), authorizing the retention and employment of Cullen and Dykman LLP ("C&D") as counsel to the

<sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Application.



Debtor, effective as of the Petition Date; and upon the affidavit of Matthew G. Roseman, Esq., a member of C&D, sworn to on October 2, 2024 (the "Roseman Affidavit"), which includes the statement of C&D pursuant to section 329 of the Bankruptcy Code and Bankruptcy Rule 2016; the Court finds that the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, this is a core matter pursuant to 28 U.S.C. § 157(b)(2), notice of the Application was sufficient under the circumstances and that no further notice need be given; C&D is "disinterested" and eligible for retention pursuant to sections 101(14) and 327(a) of the Bankruptcy Code, the terms of the engagement are reasonable and appropriate, and the legal and factual bases set forth in the Application and Roseman Affidavit establish just cause for the relief granted herein, it is hereby

ORDERED, that the Application is granted to the extent provided herein; and it is further

ORDERED, that the Debtor is hereby authorized, pursuant to sections 327(a) and 328(a) of the Bankruptcy Code, Bankruptcy Rules 2014(a), 2016 and 5002, and Local Rule 2014-1, to retain and employ C&D as counsel to represent it as debtor and debtor-in-possession effective as of the Petition Date on the terms set forth in the Application and the Roseman Affidavit, with the compensation of and expense reimbursement to C&D to be hereafter fixed by this Court upon the filing of a proper application or applications therefor under 11 U.S.C. §§ 330 and 331 and/or in accordance with any Court order establishing procedures for interim or periodic compensation; and it is further

ORDERED, prior to any increases in C&D's rates for any individual employed by C&D and providing services in this case, C&D shall file a supplemental affidavit with the Court and provide ten business days' notice to the Debtor, the U.S. Trustee and any parties in interest that

have filed a notice of appearance and request for notices. The supplemental affidavit shall explain the basis for the rate increases in accordance with Section 330(a)(3)(F) of the Bankruptcy Code. The U.S. Trustee retains all rights to object to any rate increase on all grounds, including, but not limited to, the reasonableness standard provided for in Section 330 of the Bankruptcy Code, and the Court retains the right to review any rate increase pursuant to Section 330 of the Bankruptcy Code; and it is further

ORDERED, that C&D is authorized to perform the following services:

- (a) Advising the Debtor with respect to its power and duties in the continued operation of its business and management of its property as a debtor and debtor-in-possession;
- (b) Taking all necessary actions to protect and preserve the value of the estate of the Debtor and related matters;
- (c) Representing the Debtor before this Court, and any other court of competent jurisdiction, on matters pertaining to its affairs as a debtor and debtor-in-possession, including prosecuting and defending litigated matters that may arise during this Chapter 11 case;
- (d) Advising and assisting the Debtor in the preparation and negotiation of a plan of reorganization with its creditors and other parties in interest;
- (e) Advising the Debtor in connection with financing matters;
- (f) Advising the Debtor in connection with the sale of its assets;
- (g) advising the Debtor with respect to any teach-out agreements and its obligations and rights thereunder;
- (h) advising the Debtor on education and corporate law matters;

- (i) Preparing all necessary or appropriate applications, motions, complaints, answers, orders, reports and other legal documents;
- (j) Taking all necessary actions to protect and preserve the value of the estate of the Debtor and related matters;
- (k) Performing all other legal services for the Debtor that may be desirable and necessary in this Chapter 11 case; and it is further

ORDERED, that the terms of this Order shall be immediately effective and enforceable upon its entry; and it is further

ORDERED, that to the extent the Application and engagement letter are inconsistent with this Order, the terms of this Order shall govern; and it is further

ORDERED, that C&D shall use its best efforts to avoid duplication of services provided by any of the Debtor's other retained professionals in this chapter 11 case; and it is further

ORDERED, that C&D shall apply any remaining amounts of its pre-petition retainer toward post-petition fees and expenses, after such post-petition fees and expenses are approved pursuant to the first Order of the Court awarding fees and expenses to C&D; and it is further

ORDERED, that C&D will not seek to use affiliates, independent contractors, subcontractors or subsidiaries of C&D to perform services under the engagement letter without separate Court approval; and it is further

ORDERED, that the Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.

# # #

Exhibit C

Certification of Matthew Roseman

CULLEN AND DYKMAN LLP  
80 State Street, Suite 900  
Albany, New York 12207  
Matthew G. Roseman, Esq.  
Bonnie L. Pollack, Esq.  
(516) 357-3700

*Attorneys for The College of Saint Rose*

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF NEW YORK

-----X  
In re:

: Chapter 11  
:

THE COLLEGE OF SAINT ROSE,

: Case No. 24-11131 (REL)  
:

Debtor.  
-----X

**CERTIFICATION IN SUPPORT OF FIRST INTERIM APPLICATION FOR  
ALLOWANCE OF COMPENSATION FOR PROFESSIONAL SERVICES  
RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED BY CULLEN  
AND DYKMAN LLP AS COUNSEL TO THE COLLEGE OF  
SAINT ROSE FOR THE PERIOD FROM OCTOBER 10, 2024  
THROUGH AND INCLUDING JANUARY 31, 2025**

I, Matthew G. Roseman, hereby certify that:

1. I am a partner with the applicant firm, Cullen and Dykman LLP ("C&D"), which serves as counsel to The College of Saint Rose (the "Debtor") in this chapter 11 case, and am admitted to appear before this Court.

2. I have reviewed Rule 2016-1 of the Local Bankruptcy Rules for the Northern District of New York (the "Local Bankruptcy Rules"), and the *United States Trustee's Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330* (the "Fee Guidelines"), and the *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professional and (III)*

*Granting Related Relief*, entered November 14, 2024 [Docket No. 123] (the “Order,” together with the Fee Guidelines, the “Guidelines”).

3. This certification is made in respect of compliance with the Guidelines in connection with C&D’s application (the “Application”) dated February \_\_, 2025, for interim compensation and reimbursement of expenses for the period commencing October 10, 2024 through and including January 31, 2025 (the “First Application Period”).

4. I certify that:

- a. I have read the Application;
- b. To the best of my knowledge, information and belief formed after reasonable inquiry, the fees and disbursements sought fall within the Guidelines;
- c. The fees and disbursements sought in this Application are billed at rates and are in accordance with practices customarily employed by C&D and are generally accepted by C&D’s clients; and
- d. In providing reimbursable service, C&D does not make a profit in its performance of reimbursable services, whether the service is performed inhouse or through a third party.

5. I certify that in accordance with the Order, C&D filed fee statements monthly in accordance therewith by the 20th day of the succeeding month, which statements were approved by the Debtor. Such statements were served upon the Office of the United States Trustee and counsel for the pre-and post-petition lenders contemporaneously with their filing. The statements included the amount of fees and out-of-pocket expenses incurred, lists of professionals and paraprofessionals providing services, their respective billing rates, the work hours expended by each individual, descriptions of services rendered, and a reasonably detailed breakdown of out-of-pocket expenses incurred.

6. I certify that prior to filing this Application, C&D provided copies of this Application to the Debtor and the Debtor certified its acceptance of the Application.

7. In accordance with Bankruptcy Rule 2016(a) and section 504 of the Bankruptcy Code, I certify that no agreement or understanding exists between C&D and any other entity for the sharing of compensation received or to be received for services rendered in or in connection with the above cases except as authorized pursuant to the Bankruptcy Code, the Bankruptcy Rules, and the Local Bankruptcy Rules. All services for which compensation is sought were professional services on behalf of the Debtor and not on behalf of any other person.

Dated: Albany, New York  
February 18, 2025

CULLEN AND DYKMAN LLP

By: s/ Matthew Roseman  
Matthew G. Roseman, Esq.  
Bonnie L. Pollack, Esq.  
80 State Street, Suite 900  
Albany, New York 12207  
(516) 357-3700

*Counsel for The College of Saint Rose*

**Exhibit D**

**Project Category Summary**

<b>Matter No.</b>	<b>Project Category</b>	<b>Hours</b>	<b>Fees</b>
1	General Administration	158.5	\$108,218.00
2	Cash Collateral and DIP Financing	38.1	\$30,323.50
3	Asset Disposition, Sale or Restructuring	252.1	\$190,327.00
4	Resolution of Creditor Issues	12.7	\$8,759.50
5	Claims Objections/Resolutions	3.8	\$2,093.50
6	Plan and Disclosure Statement	16.5	\$13,448.50
7	Leases and Executory Contracts	.5	\$435.00
8	Retention of Professionals and Fee Statements	15.2	\$12,415.50
9	Preparation for/Attendance at Court Hearings	52.3	\$41,162.50
11	Non-Working Travel (Not charged)	97.8	\$0.00
12	Motion Practice	30.6	\$22,817.50
13	Operating Reports	4.2	\$3,423.00
14	Governance Issues	90.5	\$54,273.50
15	Educational/Regulatory Matters	15.7	\$6,327.50
16	Endowment/Attorney General Matters	112.3	\$50,728.50
17	PBGC Issues	45.8	\$23,974.00
18	Employment Matters	22.1	\$11,533.00
19	Record Retention	7.1	\$4,400.50
	<b>TOTAL</b>		<b>\$584,660.50</b>



**Exhibit E**

**Professionals Summary**

Name	Title	Department	Admission Year	Rate	Hours Billed	Amount Billed
Matthew Roseman	Partner	Bankruptcy & Creditors' Rights	1989	\$870.00	171.5	\$149,205.00
Bonnie Pollack	Partner	Bankruptcy & Creditors' Rights	1990	\$815.00	361.0	\$294,215.00
Christopher Buckey	Partner	Litigation	1999	\$395.00	8.8	\$3,476.00
Kevin McDonough	Partner	Corporate/Education	1989	\$395.00	4.8	\$1,896.00
Dina Vespia	Partner	Corporate/Education	2010	\$395.00	189.5	\$74,852.50
Deirdre Mitacek	Of Counsel	Tax	1997	\$395.00	41.5	\$16,392.50
Andrew Nitkewicz	Partner	Trust and Estates	1999	\$395.00	3.1	\$1,224.50
Ryan Soebke	Partner	Litigation	2017	\$395.00	.8	\$316.00
Daniel Parise	Associate	Corporate	2023	\$395.00	7.0	\$2,765.00
Jordan Milite	Associate	Corporate	2024	\$395.00	18.1	\$7,149.50
Bozena Diaz	Partner	Tax	2005	\$395.00	12.3	\$4,858.50
Michael Eng	Partner	Banking	2014	\$640.00	20.1	\$12,864.00
Dana Aprigliano	Law Clerk	---		\$280.00	4.7	\$1,316.00
Kyriaki Christodoulou	Associate	Bankruptcy & Creditors' Rights	2021	\$410.00	25.6	\$10,496.00
Ryan Goldberg	Associate	Corporate/Education	2023	\$395.00	9.2	\$3,634.00

Exhibit F

Time Records

Cullen & Dykman LLP

THE COLLEGE OF SAINT ROSE  
File Number: 22484-000-3

February 6, 2025  
Control #: 7504731

**TASK TIME SUMMARY**

Task	Description	Hours	Amount
B100	GENERAL ADMINISTRATION	158.50	108,218.00
B120B	CASH COLLATERAL & DIP FINANCING	38.10	30,323.50
B130B	ASSET DISPOSITION, SALE OR RESTRUCTURE	252.10	190,327.00
B140B	RESOLUTION OF CREDITOR ISSUES	12.70	8,759.50
B150B	CLAIMS OBJECTIONS/RESOLUTIONS	3.80	2,093.50
B160B	PLAN & DISCLOSURE STATEMENT	16.50	13,448.50
B170B	LEASES & EXECUTORY CONTRACTS	.50	435.00
B180B	RETENTION/PROFESSIONAL COMPENSATION/FEE	15.20	12,415.50
B185B	PREPARATION FOR/ATTEND COURT HEARING	52.30	41,162.50
B195B	NON-WORKING TRAVEL	97.80	.00
B210B	MOTION PRACTICE	30.60	22,817.50
B220B	OPERATING REPORTS	4.20	3,423.00
B230A	GOVERNANCE ISSUES	90.50	54,273.50
B240B	EDUCATION/REGULATORY MATTERS	15.70	6,327.50
B250B	ENDOWMENT/ATTORNEY GENERAL MATTERS	112.30	50,728.50
B260B	PENSION PLAN/PBGC ISSUES	45.80	23,974.00
B270B	EMPLOYMENT MATTERS	22.10	11,533.00
B310B	RECORDS RETENTION	7.10	4,400.50
<b>TOTALS</b>		<b>975.80</b>	<b>\$ 584,660.50</b>

**TASK DISBURSEMENTS SUMMARY**

Task	Description	Amount
E106	ON-LINE RESEARCH	230.68
E107	DELIVERY SERVICES/MESSENGER	2,706.45
E108	POSTAGE	2,524.55
E111	MEALS	451.10
E112	COURT FEES	2,585.00
E115	DEPOSITIONS	1,679.45
<b>TOTALS</b>		<b>\$ 10,177.23</b>



Cullen and Dykman LLP  
The Omni Building  
333 Earle Ovington Blvd, 2<sup>nd</sup> Floor  
Uniondale, NY 11553  
T: 516.357.3700  
F: 516.357.3792  
Tax ID: 11-0658700

THE COLLEGE OF SAINT ROSE  
432 WESTERN AVENUE  
ALBANY, NY 12203

February 6, 2025

File Number: 22484-000-3

Control Number 7504731

RE: BANKRUPTCY FILING

PROFESSIONAL SERVICES

B100 GENERAL ADMINISTRATION

Date	Atty	Task	Actv	Description	Hours	Amount
10/10/24	BLP	B100		Revise and finalize all first day documents and petition	4.20	3,423.00
10/10/24	BLP	B100		File and oversee service all documents	4.60	3,749.00
10/10/24	BLP	B100		Prepare service lists for several different motions	.60	489.00
10/10/24	BLP	B100		Conference with MR and DV re next steps in case and strategy	.70	570.50
10/10/24	BLP	B100		Calls with Court re filing, first day hearing	.40	326.00
10/10/24	BLP	B100		Comms re utility issues	.30	244.50
10/10/24	BLP	B100		Additional Comms with chambers with all first day pleadings	.40	326.00
10/10/24	DV	B100		Attention to draft media responses	.60	237.00
10/10/24	DV	B100		Meeting w/ M. Roseman and B. Pollack to discuss submission of filing and discuss service.	.60	237.00
10/10/24	KC	B100		Preparing list of notice recipients for all motions.	.60	246.00
10/11/24	BLP	B100		Comms with client re information for OCP motion	.20	163.00
10/11/24	BLP	B100		Several comms regarding and review of AOSs and matrices to be filed in case	.50	407.50

Cullen & Dykman LLP

THE COLLEGE OF SAINT ROSE  
File Number: 22484-000-3

February 6, 2025  
Control #: 7504731

Date	Atty	Task	Actv	Description	Hours	Amount
10/11/24	BLP	B100		Letter to Canon re automatic stay and stay of litigation; several comms regarding and review of AOSs and matrices to be filed in case; comms with client re information for OCP motion	.30	244.50
10/11/24	BLP	B100		Prepare for and participate in call with client re dos and don'ts in bankruptcy, payments allowed and not, effect of filing and communications with creditors and other parties	.70	570.50
10/11/24	MGR	B100		Emails regarding first day hearings and coordinating court presentation	.30	261.00
10/14/24	BLP	B100		Comms with Canon re stay and notice of filing	.20	163.00
10/15/24	BLP	B100		Post-hearing meeting with client re: all bankruptcy matters	2.00	1,630.00
10/15/24	BLP	B100		Comms re responses to press inquiries	.40	326.00
10/15/24	BLP	B100		Comms with JLL re status	.20	163.00
10/15/24	MGR	B100		De-brief meeting with clients after 1st day hearing	1.50	1,305.00
10/16/24	MGR	B100		Phone conf w/ D Posner regarding his representation of Sodexo and possible committee formation.	.40	348.00
10/16/24	MGR	B100		Zoom meeting with clients regarding hearing dates and necessary parties.	.50	435.00
10/16/24	DV	B100		Meeting w/ client to discuss process and procedures	1.00	395.00
10/16/24	DV	B100		Attended communications team meeting	.50	197.50
10/16/24	DMM	B100		Email w/ LJ. Whittaker corporate documents	.20	79.00
10/18/24	BLP	B100		Discussion with client re questions on accounts payable, utility deposits	.30	244.50
10/18/24	BLP	B100		Discussion with client re DIP designation of bank accounts, bank requests for information and issues with certain banks	.30	244.50
10/18/24	BLP	B100		Review request for additional adequate protection by National Grid and comms re same	.20	163.00

Cullen & Dykman LLP

THE COLLEGE OF SAINT ROSE  
File Number: 22484-000-3

February 6, 2025  
Control #: 7504731

Date	Atty	Task	Actv	Description	Hours	Amount
10/18/24	BLP	B100		Comms with UST and client re IDI, 341 meeting, 941 tax payments	.30	244.50
10/18/24	BLP	B100		Revise and comms with client re schedules	1.80	1,467.00
10/18/24	MGR	B100		Review Times Union article regarding Chapter 11 case.	.30	261.00
10/18/24	DV	B100		Meeting w/ M. White and L. Thomson to discuss pending matters.	.50	197.50
10/21/24	BLP	B100		Conferences re master service list per order and review of rules re service on governmental agencies	.60	489.00
10/21/24	BLP	B100		Discussion with client re payments of invoices, administrative issues	.30	244.50
10/21/24	BLP	B100		Letter to B. Davis re automatic stay and stay of action	.30	244.50
10/21/24	MGR	B100		Draft letter to creditors regarding treatment of pre-petition claims.	.50	435.00
10/21/24	DV	B100		Attended communications team meeting.	.50	197.50
10/22/24	BLP	B100		Discussion with client re OCP motion	.20	163.00
10/22/24	BLP	B100		Discussion with counsel for National Grid re adequate assurance request	.20	163.00
10/22/24	BLP	B100		Review client comms re oil tanks and email to UST re same	.40	326.00
10/22/24	BLP	B100		Comms with client re changes to schedules and information needed	.20	163.00
10/22/24	MGR	B100		Call with FTI team and client to review budget and discuss case status and progress.	.70	609.00
10/22/24	DV	B100		Emails w/ Kessler re: schedules (.2); emails w/ M. Roseman and B. Pollack re: budget (.2)	.40	158.00
10/22/24	DV	B100		Attended meeting w/ client and FTI re: budget	.40	158.00
10/23/24	BLP	B100		Comms with lenders re BOV, final order status	.20	163.00
10/23/24	BLP	B100		Discussion with client re National Grid adequate assurance	.20	163.00
10/23/24	BLP	B100		Comm with Grid counsel re same	.10	81.50

Cullen & Dykman LLP

THE COLLEGE OF SAINT ROSE  
File Number: 22484-000-3

February 6, 2025  
Control #: 7504731

Date	Atty	Task	Actv	Description	Hours	Amount
10/23/24	BLP	B100		Review additional information provided for schedules and several comms with client re questions on same	1.40	1,141.00
10/23/24	BLP	B100		Revise schedules	.90	733.50
10/23/24	BLP	B100		Email to client with National Grid agreement, amounts to send to Grid and to deposit into security account	.20	163.00
10/23/24	BLP	B100		Comms with Whiteman re stay of small claims case and notice to be filed with court in case	.20	163.00
10/23/24	DV	B100		Emails w/ B. Pollack re: fee information for schedules.	.20	79.00
10/23/24	DV	B100		Attention to bankruptcy timeline	.20	79.00
10/24/24	BLP	B100		Review comms re change of designation of bank accounts and follow up with client re same	.30	244.50
10/25/24	BLP	B100		Comms with Grid re payments made per agreement (.2); review utility order for any changes needed as a result of agreement with Grid (.2)	.40	326.00
10/28/24	BLP	B100		Review comms from client re various administration issues; comms with creditor re request for documents and send same	.40	326.00
10/28/24	BLP	B100		Review schedules and comms re same, information still needed	.60	489.00
10/28/24	BLP	B100		Comms re credit card use and collateral requests	.20	163.00
10/28/24	BLP	B100		Call with client re all bankruptcy matters, legal issues	.70	570.50
10/28/24	MGR	B100		Status call with client regarding update of bankruptcy process and outstanding issues.	.70	609.00
10/28/24	DV	B100		Attended communications team huddle	.50	197.50
10/28/24	DV	B100		Attended meeting w/ College leadership re: pending legal matters	.70	276.50
10/28/24	KC	B100		Drafting correspondence to bank re: no appointment of trustee.	.20	82.00
10/29/24	BLP	B100		Review comms from UST re IDI, documents requested and send to client	.40	326.00
10/29/24	BLP	B100		Call with client and FTI re financials, status of all motions	.70	570.50

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THE COLLEGE OF SAINT ROSE  
File Number: 22484-000-3

February 6, 2025  
Control #: 7504731

Date	Atty	Task	Actv	Description	Hours	Amount
10/29/24	MGR	B100		FTI team status call regarding budget and operational issues.	.70	609.00
10/29/24	DV	B100		Attended meeting with College leadership and advisors on all bankruptcy issues	.60	237.00
10/30/24	BLP	B100		Review and respond to several comms with client re administrative matters	.40	326.00
10/30/24	BLP	B100		Review auditor questions and comms re same	.40	326.00
10/30/24	BLP	B100		Comms re agenda for hearing	.20	163.00
10/30/24	BLP	B100		Lengthy discussion with client re several administrative matters including documents for IDI	.50	407.50
10/30/24	BLP	B100		Conferences with client, MR and DV re uncashed checks	.40	326.00
10/30/24	BLP	B100		Review court communication re returned mail and comms re updated address	.30	244.50
10/30/24	BLP	B100		Comms re information for schedules and finalizing same	.30	244.50
10/30/24	BLP	B100		Comms re location of art and pianos in connection with BH questions	.30	244.50
10/30/24	MGR	B100		Review process for transferring control from board of trustees to plan administrator.	.50	435.00
10/30/24	KC	B100		Preparing notice of proposed agenda of matters set for hearing on 11.6.2024.	.50	205.00
10/31/24	BLP	B100		Discussion with FTI re information for schedules	.50	407.50
10/31/24	BLP	B100		Comms and meetings re uncashed checks and dealing with same in bankruptcy, payroll, etc.	.60	489.00
10/31/24	BLP	B100		Prepare agenda of items needed to discuss for motions and schedules	.40	326.00
10/31/24	BLP	B100		Discussion with Key Bank re bank account designation, pension account	.30	244.50
10/31/24	BLP	B100		Meeting with DV/MR re audit questions and response to same	.50	407.50
10/31/24	BLP	B100		Weekly call with client and FTI re bond debt, sale of personalty, uncashed checks, open issues	1.00	815.00



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Date	Atty	Task	Actv	Description	Hours	Amount
10/31/24	BLP	B100		Comms with client re information requests from UST	.20	163.00
10/31/24	BLP	B100		Comms with client re various admin issues	.30	244.50
10/31/24	BLP	B100		Comms with Key Bank re bank account designation, pension account	.30	244.50
10/31/24	BLP	B100		Meeting with DV/.MR re audit questions and response to same	.50	407.50
10/31/24	BLP	B100		Comms with client re information requests from UST	.20	163.00
10/31/24	BLP	B100		Weekly call with client and FTI re bond debt, sale of personalty, uncashed checks, open issues	1.00	815.00
10/31/24	BLP	B100		Conferences with DV and DV/MR re administrative issues and strategy re client concerns	.80	652.00
10/31/24	MGR	B100		Prepare for conf call with client and FTI regarding abandoned funds, DIP Order and personal property sales issues.	.50	435.00
10/31/24	MGR	B100		Participate in conf call with client, C & D team and FTI regarding issues surrounding abandoned funds, DIP order and personal property sales and proceed allocations.	1.00	870.00
10/31/24	DV	B100		Telephone call w/ B. Pollack re: open issues	.20	79.00
10/31/24	DV	B100		Emails w/ B. Pollack re: pre-petition fees	.30	118.50
10/31/24	DV	B100		Meetings w/ M. Roseman and B. Pollack re: open items	1.00	395.00
10/31/24	DV	B100		Meeting w/ client and FTI re: open items	1.10	434.50
11/01/24	BLP	B100		Work on schedules	.90	733.50
11/01/24	BLP	B100		Finalize and file November Master Service list; discussion with M&T re P Card account and security requested	.40	326.00
11/01/24	BLP	B100		Comms with client re old uncashed checks, adding to schedules, issues re same	.30	244.50
11/01/24	KC	B100		Review and respond to notice sent by Nationwide requesting information.	.50	205.00
11/03/24	BLP	B100		Review documents from client regarding, and email UST regarding, designation of accounts and balances in same	.40	326.00

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Date	Atty	Task	Actv	Description	Hours	Amount
11/03/24	BLP	B100		Review and respond to comms re South Carolina fines and inclusion in schedules (.3); comms re utility security deposit account and amounts (.2)	.50	407.50
11/03/24	BLP	B100		Continued work on schedules	.60	489.00
11/03/24	BLP	B100		Comms re research on south Carolina action re fines, stay issues (.2); comms re service of bar date order, rules re same (.2)	.40	326.00
11/04/24	BLP	B100		Comms with BHs re insurance policies, final orders (.2); comms re South Carolina fines, police actions, stay (.3)	.50	407.50
11/04/24	BLP	B100		Review updates to schedules	.40	326.00
11/04/24	BLP	B100		Comms re insurance policies, declarations, copies needed for constituents	.40	326.00
11/04/24	DV	B100		Attended communications team meeting.	.50	197.50
11/04/24	KC	B100		Reviewing and researching bankruptcy code, and case law on police power exceptions to automatic stay.	1.80	738.00
11/06/24	BLP	B100		Finalize and file schedules and SOFA and email same to UST	1.30	1,059.50
11/06/24	BLP	B100		Comms re piano sale issues and questions posed by BHs (.2); discussion with Key Bank re bank fees associated with accounts and payment of same (.2)	.40	326.00
11/06/24	BLP	B100		Comms with lender re insurance policies	.30	244.50
11/06/24	DV	B100		Attended meeting re: pending matters and communications (.3); meeting w/ B. Pollack to discuss outstanding items (.3).	.60	237.00
11/07/24	BLP	B100		Discussions with client re various issues including piano sales, authority objection, potential critical vendor	.60	489.00
11/07/24	BLP	B100		Compile and send several comms to UST with IDI documents requested	1.30	1,059.50
11/07/24	BLP	B100		Comms re proposal to BHs re deal on pianos and review spreadsheets re same	.40	326.00

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Date	Atty	Task	Actv	Description	Hours	Amount
11/07/24	BLP	B100		Conferences re deficiency notice from court, documents had been filed and respond to court(.3); comms re additional creditors need to be added to schedules (.2)	.50	407.50
11/07/24	DV	B100		Attention to media response (.2); meeting w/ B. Pollack and M. Roseman re: pending matters (.3)	.50	197.50
11/07/24	DV	B100		Emails re: schedules (.3); attention to emails re: vendor issue (.2)	.50	197.50
11/08/24	BLP	B100		Comms with client and UST re need to add UST to insurance certificates, questions on same	.40	326.00
11/08/24	BLP	B100		Comms re M&T security account and set up of same (.2); conference re service of bar date order and review same (.2)	.40	326.00
11/11/24	BLP	B100		Call with client re status of all bankruptcy matters and issues	.70	570.50
11/11/24	MGR	B100		Participate in strategy call and prep for IDI/341 conferences.	.70	609.00
11/12/24	BLP	B100		Prepare for and participate in IDI	1.20	978.00
11/12/24	BLP	B100		Preparation with client for 341 meeting	1.30	1,059.50
11/13/24	DV	B100		Attended meeting w/ L. Thomson, M. White, and Kessler re: press responses	.50	197.50
11/14/24	BLP	B100		Discussions re press inquiries and responses to same	.70	570.50
11/14/24	BLP	B100		Conference with DV, MR re fiduciary issues, Authority issues	.90	733.50
11/14/24	DV	B100		Attention to media inquiries	.20	79.00
11/14/24	DV	B100		Meeting to discuss response to media responses	.50	197.50
11/14/24	DV	B100		Meeting w/ M. Roseman and B. Pollack to discuss pending matters	.90	355.50
11/15/24	DV	B100		Emails w/ L. Thomson re: media response (.2); emails w/ L. Thomson re: prep for 341 meeting (.2).	.40	158.00
11/17/24	BLP	B100		Review and comm re UST IDI questions (.3); comms re question on change of benefits payments (.2)	.50	407.50

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Date	Atty	Task	Actv	Description	Hours	Amount
11/17/24	BLP	B100		Respond to several comms from client re administration questions	.30	244.50
11/17/24	BLP	B100		Comms with client re 341 prep questions	.20	163.00
11/18/24	BLP	B100		Comms with client re all entered orders and instructions for tasks needed under same	.40	326.00
11/18/24	BLP	B100		Prepare response to UST re IDI questions and information requests	.40	326.00
11/18/24	BLP	B100		Discussion with DV re 341 meeting, prep re same	.30	244.50
11/18/24	BLP	B100		Lengthy discussion with client re 341 prep, MORs, audit	1.00	815.00
11/18/24	MGR	B100		Participate in status call with Client and select board members.	1.00	870.00
11/18/24	DV	B100		Attended communications team meeting	.50	197.50
11/18/24	DV	B100		Attended 341 meeting prep	.80	316.00
11/19/24	BLP	B100		Call with Debtor and FTI re budget, DIP, MORs, sale, other administrative issues	.70	570.50
11/19/24	BLP	B100		Discussion with client re health benefits questions, cy pres, employee warn act extensions, record retention and other issues in case	.80	652.00
11/19/24	MGR	B100		Weekly update call with FTI and client.	.50	435.00
11/19/24	MGR	B100		Conf call with client team to review sales process/allocation of prices, employee benefit issues,Cy pres petition, document retention motion and 341 prep.	1.00	870.00
11/19/24	DV	B100		Attended meeting w/ client re: all outstanding matters	.50	197.50
11/19/24	DV	B100		Meeting w/ M. Roseman and B. Pollack to discuss various filings	.40	158.00
11/19/24	DV	B100		Conference call w/ S. Harding re: court filings	.30	118.50
11/20/24	BLP	B100		Comms with client re additional 341 prep, background issues for 341	1.00	815.00
11/20/24	DV	B100		Attended meeting re: 341 meeting prep (1.5);	1.50	592.50
11/20/24	DV	B100		Meeting w/ B. Pollack re: 341	.40	158.00

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Date	Atty	Task	Actv	Description	Hours	Amount
11/20/24	DV	B100		Emails and telephone call w/ L. Thomson re: 341	.30	118.50
11/21/24	BLP	B100		Prepare for and participate in 341 meeting and debrief with client re same	3.10	2,526.50
11/21/24	BLP	B100		Meeting with client re sale of personal property, pension issues	.40	326.00
11/21/24	KC	B100		Participate in 341 Meeting of Creditors.	.90	369.00
11/22/24	BLP	B100		Comms with Frank Brennan re 341 meeting (.2); comms re stop payments on uncashed checks (.2)	.40	326.00
11/22/24	BLP	B100		Review and comment on media responses (.2); comms re information requested by UST at 341 (.2)	.40	326.00
11/22/24	DV	B100		Attention to draft media request (.2); telephone call w/ L. Thomson and E. Friedlander re: same (.2); emails w/ M. Roseman and B. Pollack re: same (.2).	.60	237.00
11/25/24	BLP	B100		Comms re bar date notice, questions from creditors	.20	163.00
11/26/24	BLP	B100		Conferences with DV, MR re status of all matters (.3); comms with UST re information requested at 341 (.2)	.50	407.50
11/27/24	BLP	B100		Review list for amendment to schedule F and comms re comparison to original schedules	.40	326.00
11/27/24	KC	B100		Reviewing schedule E/F and comparing with list of creditors in excel.	.40	164.00
12/02/24	BLP	B100		Comms with client re amendments to schedules	.40	326.00
12/02/24	DV	B100		Attended meeting re: communications.	.70	276.50
12/02/24	KC	B100		Reviewing original schedules to identify necessary amendments/additions to creditors list.	.30	123.00
12/03/24	BLP	B100		Review and revise amendments to schedules	.80	652.00
12/03/24	MGR	B100		Conf call with clients and FTI regarding case status, strategy, sales process and structure of auction.	.80	696.00
12/03/24	MGR	B100		Review amended schedules and discuss changes with B Pollack	.80	696.00
12/04/24	BLP	B100		Comms with client re amendment to schedules, review additional information	.40	326.00

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12/04/24	MGR	B100		Conf with B Pollack regarding employment contracts and schedule amendment issues.	.40	348.00
12/05/24	BLP	B100		Comms re response to press inquiries re bids, auction process	.40	326.00
12/05/24	BLP	B100		Discussion with former employee re bar date notice, POC	.20	163.00
12/06/24	BLP	B100		Prepare for and participate in call re press inquiries and responses	1.00	815.00
12/06/24	BLP	B100		File amended schedules and comms re filing of amended matrix	.40	326.00
12/06/24	DV	B100		Attended meeting re: media strategy (.7); attention to emails re: press and media inquiries (.6).	1.30	513.50
12/07/24	DV	B100		Attention to media coverage.	.30	118.50
12/08/24	BLP	B100		Review responses to press reports and comment on same	.70	570.50
12/08/24	MGR	B100		Review proposed media plan and email concerns regarding same.	.50	435.00
12/08/24	DV	B100		Attention to draft communications.	.40	158.00
12/09/24	BLP	B100		Prepare for and participate in call re press inquiries and responses to same	1.30	1,059.50
12/09/24	DV	B100		Attended communications team meeting.	1.00	395.00
12/10/24	BLP	B100		Discussion with DV re status of all motions and sale issues in bankruptcy case (.3); discussion with Key Bank re same (.1); comms with PBGC on same (.1)	.50	407.50
12/11/24	BLP	B100		Prepare for and participate in call with client and Kessler re response to press inquiries re bids, auction, case	1.00	815.00
12/11/24	DV	B100		Attended communications meeting.	.60	237.00
12/11/24	DV	B100		Emails re: auction communications and draft statements.	1.30	513.50
12/12/24	DV	B100		Attention to draft communications.	.70	276.50
12/13/24	BLP	B100		Comms re response to press inquiries re auction	.40	326.00

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12/13/24	DV	B100		Attention to draft media responses.	.30	118.50
12/16/24	BLP	B100		Comms with client re auditor invoices, payment of same under OCP order	.20	163.00
12/16/24	BLP	B100		Call with client re outstanding matters in case including sales, unemployment and other claims, motions	1.10	896.50
12/16/24	MGR	B100		E-mails with client and E Friedlander from Kessler PR regarding response to Bloomberg media inquiry.	.40	348.00
12/16/24	MGR	B100		Status call with client regarding Chapter 11 next steps and issues related to court hearing on 12/19.	1.00	870.00
12/16/24	DV	B100		Prepared for and attended legal meeting w/ client leadership.	1.20	474.00
12/17/24	BLP	B100		Comms with UST re bank accounts and questions on same	.20	163.00
12/17/24	BLP	B100		Several comms with UST and client re Kessler services and questions re same	.60	489.00
12/17/24	DV	B100		Meeting w/ College leadership and consultants re: pending matters.	1.00	395.00
12/17/24	DV	B100		Emails and meeting w/ B. Pollack re: UST inquiry (.3); conference call w/ B. Pollack and M. White re: UST inquiry (.3).	.60	237.00
12/18/24	BLP	B100		Call with client and Kessler re responses to press inquiries, press release	.50	407.50
12/18/24	DV	B100		Attention to draft press release (.4);	.40	158.00
12/18/24	DV	B100		Emails w/ M. Roseman and B. Pollack re: same (.2);	.20	79.00
12/18/24	DV	B100		Attended meeting re: communications (.5);	.50	197.50
12/18/24	DV	B100		Attention to emails re: media responses (.3).	.30	118.50
12/19/24	DV	B100		Emails re: media responses.	.60	237.00
12/23/24	MGR	B100		Review and circulate article on closing of college campuses.	.30	261.00
12/23/24	DV	B100		Attention to insurance renewal proposals.	.20	79.00

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Date	Atty	Task	Actv	Description	Hours	Amount
12/24/24	BLP	B100		File organization for all auction and contract documents, pleadings in case	.50	407.50
12/26/24	BLP	B100		Conference with MR./DV re insurance policies, what needed, quotes, etc.	.40	326.00
12/26/24	BLP	B100		Call with client re insurance policies, quotes, renewals	.50	407.50
12/26/24	KM	B100		Preparing for and participating in conference call with College's CFO and Vice President for Administration re: insurance needs.	1.40	553.00
12/26/24	MGR	B100		Internal phone conf regarding insurance coverage in preparation for client call.	.50	435.00
12/26/24	MGR	B100		Conf call w/ D Polley and J Schnapp, B Pollack, D.Vespia and K McDonough regarding extent and cost of insurance coverage and budget issues.	.50	435.00
12/26/24	DV	B100		Reviewed insurance proposal.	.30	118.50
12/26/24	DV	B100		Emails re: Kessler contract.	.20	79.00
12/26/24	DV	B100		Conference call w/ J. Knapp and D. Polley re: insurance.	.50	197.50
12/26/24	DV	B100		Internal meeting to discuss issues.	.50	197.50
12/27/24	BLP	B100		Review and reconcile escrow account	.40	326.00
12/27/24	DV	B100		Emails w/ M. White re: Kessler extension.	.20	79.00
12/30/24	BLP	B100		Discussion with DV re cy pres, plan, FTI work, contracts, record retention	.40	326.00
12/30/24	BLP	B100		Review and comment on Kessler contract extension (.2); comms re insurance renewals (1).	.30	244.50
12/30/24	DV	B100		Telephone call w/ B. Pollack re: pending matters	.20	79.00
12/30/24	DV	B100		Prepared Kessler contract extension and emails re:same.	.50	197.50
12/31/24	BLP	B100		Comms re 1099 information needed	.20	163.00
1/02/25	BLP	B100		Conference with DV re agenda of matters to be addressed upon client return from vacation (.3); file updated master service list (.2)	.50	407.50



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Date	Atty	Task	Actv	Description	Hours	Amount
1/02/25	BLP	B100		Meeting with MR and DV re open issues to be dealt with in case, plan matters	.50	407.50
1/02/25	DV	B100		Meeting w/ B. Pollack to discuss action items	.40	158.00
1/02/25	DV	B100		Meeting w/ M. Roseman and B. Pollack re: same	.50	197.50
1/02/25	DV	B100		Attention to timeline	.60	237.00
1/03/25	BLP	B100		Numerous comms with Summit counsel re endowment restrictions, CGA, agreements for sale	.50	407.50
1/03/25	MGR	B100		Review emails regarding bondholder questions regarding progress on sale and issues with Cy Pres petition/requests for additional information.	.50	435.00
1/06/25	BLP	B100		Comms with client re prioritizing work needed in case (.2); comms with client re insurance renewals and certificates (.2)	.40	326.00
1/06/25	BLP	B100		Comms with client re Lumen invoice and payment of same, not pre-petition (.1); comms with client, BHs, Summit re 1099 information needed (.3)	.40	326.00
1/06/25	BLP	B100		Meeting with client re sale issues, cy pres, endowment, pension, record retention, insurance	.90	733.50
1/06/25	MGR	B100		E-mails w/ B Pollack regarding issues concerning client call	.30	261.00
1/06/25	MGR	B100		Prepare for and participate in conf call with bondholders counsel regarding wind down process.	.80	696.00
1/06/25	DV	B100		Telephone call w/ B. Pollack re: outstanding invoice (.1); emails w/ B. Pollack re: action items (.3);	.40	158.00
1/06/25	DV	B100		Meeting w/ leadership team re: action items	1.00	395.00
1/07/25	BLP	B100		Call with client and FTI re Authority process, pension, budgeting	.80	652.00
1/07/25	BLP	B100		Follow up comms with lenders re information for W9s	.20	163.00
1/07/25	DV	B100		Meeting w/ College leadership and advisors re: pending matters.	.80	316.00

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Date	Atty	Task	Actv	Description	Hours	Amount
1/08/25	BLP	B100		Comms with client and lenders re W9s needed for payments made (.2); comms with client and BHs re insurance certificates for renewals (.2)	.40	326.00
1/09/25	BLP	B100		Continued comms with client re collections from BH collateral (.2); conference with DV re timeline and procedure for going forward in case (.3)	.50	407.50
1/10/25	DV	B100		Attention to draft media responses.	.40	158.00
1/11/25	DV	B100		Emails w/ B. Pollack re: Pine Hills Land Neighborhood Association meeting on campus.	.20	79.00
1/13/25	BLP	B100		Call with client re status of all matters pertaining to bankruptcy	1.00	815.00
1/13/25	MGR	B100		Participate in conference call with client regarding status of operational issues.	1.00	870.00
1/13/25	DV	B100		Attended communications meeting re: media responses and preparation for upcoming hearings	.50	197.50
1/13/25	DV	B100		Attended legal meeting re: pending matters	1.10	434.50
1/14/25	BLP	B100		Comms with BH, DIP, UST re COIs for renewal policies	.20	163.00
1/14/25	BLP	B100		Call with client and FTI re case issues, budgets	.50	407.50
1/14/25	DV	B100		Attended meeting w/ College leadership and FTI re: cash flow and update re: sale to ACPHLA.	.60	237.00
1/15/25	DV	B100		Meeting w/ Kessler re: hearings and upcoming events	.40	158.00
1/15/25	DV	B100		Meeting w/ M. White to discuss pending matters	.50	197.50
1/21/25	BLP	B100		Call with client and FTU re plan, cy pres, budget, operational issues	1.30	1,059.50
1/21/25	MGR	B100		Client status call	1.00	870.00
1/21/25	DV	B100		Meeting w/ FTI re: pending matters	1.00	395.00
1/21/25	DV	B100		Meeting w/ client re: same	1.40	553.00
1/22/25	BLP	B100		Comms with client re 990s, 1099s, w2s (.2); comms with client re UHY bill (.1)	.30	244.50

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Date	Atty	Task	Actv	Description	Hours	Amount
1/22/25	MGR	B100		Conf w/ B Pollack regarding action plan for winding down operations.	.40	348.00
1/23/25	BLP	B100		Discussion with DV re timeline for remainder of case	.30	244.50
1/23/25	DV	B100		Telephone call w/ B. Pollack re: action items.	.40	158.00
1/24/25	BLP	B100		Comms with BH counsel re call to go over exclusivity issues, closing status issues	.20	163.00
1/27/25	MGR	B100		Prepare for and participate in catch up call with client to discuss EC meeting and bankruptcy time line	.70	609.00
1/27/25	DV	B100		Attended legal meeting re: pending matters	1.00	395.00
1/28/25	DV	B100		Meeting re: cash flow and materials for Executive Committee meeting.	.50	197.50
1/29/25	DV	B100		Emails re: communications	.20	79.00
1/31/25	DV	B100		Emails w/ D. Polley and K. Levin re: vendor collections issues.	.30	118.50
1/31/25	DV	B100		Meeting to discuss upcoming campus event	.60	237.00
TASK SUB TOTAL						\$ 108,218.00

**B120B CASH COLLATERAL & DIP FINANCING**

Date	Atty	Task	Actv	Description	Hours	Amount
10/17/24	BLP	B120B		Comms with DIP lender re BH changes to DIP order	.20	163.00
10/21/24	BLP	B120B		Call with BHs and Summit re final DIP order and terms of same	.70	570.50
10/21/24	BLP	B120B		Follow up discussion with MR re DIP	.20	163.00
10/21/24	MGR	B120B		Conf regarding outcome of DIP lender and bondholder call and issues with final order.	.40	348.00
10/22/24	BLP	B120B		Call with client and FTI re annual budget	.50	407.50
10/22/24	BLP	B120B		Comms re annual budget and items in same	.30	244.50

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THE COLLEGE OF SAINT ROSE  
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Date	Atty	Task	Actv	Description	Hours	Amount
10/23/24	MGR	B120B		E-mail and conf regarding JLL presentation to bondholders.	.40	348.00
10/24/24	BLP	B120B		Review BH changes to DIP and comms with MR re same	.70	570.50
10/24/24	MGR	B120B		E-mail to bondholders counsel forwarding 2025 budget.	.20	174.00
10/24/24	MGR	B120B		Review revised draft of DIP order and discuss issues internally	.70	609.00
10/24/24	MGR	B120B		E-mails w/ FTI regarding timeline and budget.	.30	261.00
10/25/24	BLP	B120B		Comms re DIP concept of deficiencies in sales price	.30	244.50
10/25/24	BLP	B120B		Revise DIP order sent by BHs and comms with all parties re same	.60	489.00
10/25/24	MGR	B120B		Review revised cash collateral/DIP financing order and discuss proposed bondholder changes w/ B Pollack.	1.00	870.00
10/28/24	BLP	B120B		Review and several comms re Summit comments to BH changes to DIP order	.40	326.00
10/28/24	BLP	B120B		Comms with client, BHs, Summit re terms of DIP and negotiation of same	.60	489.00
10/28/24	BLP	B120B		Review client comments to proposed DIP changes and respond to same	.40	326.00
10/28/24	BLP	B120B		Call with FTI re open DIP issues and changes to order	.70	570.50
10/28/24	BLP	B120B		Follow up call with FTI re SOFR timing change requested	.20	163.00
10/28/24	BLP	B120B		Call with Summit and BHs re DIP terms	.30	244.50
10/28/24	MGR	B120B		Conf call with FTI regarding DIP issues and hearing on 11/5.	.50	435.00
10/28/24	MGR	B120B		Review deliverables to close DIP loan.	.60	522.00
10/28/24	DV	B120B		Emails and telephone call w/ M. Roseman re: closing preparation; (.2) email to B. Pollack and M. Roseman re: org docs in connection w/ same (.2)	.40	158.00
10/28/24	DV	B120B		Emails w/ B. Pollack and M. Roseman re: JLL materials	.40	158.00
10/28/24	DV	B120B		Emails w/ L. Thomson and B. Pollack re: schedules	.20	79.00

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Date	Atty	Task	Activ	Description	Hours	Amount
10/29/24	BLP	B120B		Comms with DIP lender re corporate documents for closing	.20	163.00
10/29/24	BLP	B120B		Comms re bank account for DIP loan	.20	163.00
10/29/24	BLP	B120B		Review additional changes requested by Summit to DIP and comms re same	.50	407.50
10/29/24	BLP	B120B		Review revised DIP order and comms re same	.40	326.00
10/29/24	BLP	B120B		Review and revise title affidavit for closing and comms re same	.40	326.00
10/29/24	BLP	B120B		Review documents requested by lender for closing	.30	244.50
10/29/24	MGR	B120B		Conf w/ B Pollack and D Vespia to discuss closing deliverables for DIP loan.	.50	435.00
10/29/24	MGR	B120B		Review changes to DIP order discuss status with B Pollack.	.50	435.00
10/29/24	DV	B120B		Meeting w/ B. Pollack and M. Roseman to discuss various motions and prep for DIP closing	.50	197.50
10/30/24	BLP	B120B		Review final DIP changes and comms re same (.3); comms re amount of bond debt in order (.2)	.50	407.50
10/30/24	KC	B120B		Prepare comparison of filed DIP motion with draft final DIP order.	.40	164.00
10/31/24	BLP	B120B		Several comms with BHs and client re calculation of bond debt for DIP order, revisions to DIP order re same	.90	733.50
10/31/24	BLP	B120B		Review revised Seller affidavit for DIP closing and comms with Summit and client re same	.40	326.00
10/31/24	BLP	B120B		Prepare incumbency certificate for DIP closing and comms with Summit re same and opinion letter	.70	570.50
11/01/24	BLP	B120B		Review requested opinion and several comms with lender re same	.70	570.50
11/01/24	BLP	B120B		Finalize DIP order documents and file with court	.80	652.00
11/01/24	BLP	B120B		Comms with lender re final DIP agreement and filing same with court; discussion with lender re date of SOFR for documents	.50	407.50

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Date	Atty	Task	Actv	Description	Hours	Amount
11/01/24	MGR	B120B		Review draft opinion letter and discuss internally with opinion committee at firm..	.70	609.00
11/03/24	BLP	B120B		Work on opinion letter for financing	.50	407.50
11/04/24	BLP	B120B		Comms re Summit opinion	.20	163.00
11/04/24	BLP	B120B		Meeting with FTI, Lender re hearing prep	1.00	815.00
11/04/24	MGR	B120B		Conf w/ Sean Harding regarding DIP motion and case administration and closing issues.	1.00	870.00
11/04/24	DV	B120B		Reviewed DIP opinion letter (.2); emails w/ B. Pollack re: same (.1).	.30	118.50
11/05/24	BLP	B120B		Comms re closing documents, signatures needed, logistics for closing	.40	326.00
11/05/24	BLP	B120B		Comms re opinion letter; revise and comms re secretary certificate	.40	326.00
11/05/24	BLP	B120B		Review changes to opinion letter and comms re same	.40	326.00
11/05/24	BLP	B120B		Several comms re closing logistics and issues re same	.60	489.00
11/05/24	BLP	B120B		Comms re adding lender to insurance policies, timing, documentation of same	.40	326.00
11/05/24	BLP	B120B		Comms re one property listed in mortgage, question on whether it was previously sold (it was not)	.20	163.00
11/05/24	DV	B120B		Emails re: opinion letter.	.30	118.50
11/06/24	BLP	B120B		Final review of, compile and send out all closing documents	1.60	1,304.00
11/06/24	BLP	B120B		Review modified closing statement and authorize same	.20	163.00
11/07/24	BLP	B120B		Review insurance certificates adding lender and comms with lender re same	.40	326.00
11/07/24	BLP	B120B		Email to client with closing documents (.2); compile secretary certificate documents and send same (.3)	.50	407.50
11/07/24	DV	B120B		Attention to documents for DIP closing.	.20	79.00
11/07/24	DV	B120B		Meeting w/ B. Pollack to discuss critical vendor motion.	.20	79.00
11/12/24	BLP	B120B		Review lender UCC and approve same	.20	163.00

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Date	Atty	Task	Actv	Description	Hours	Amount
11/19/24	BLP	B120B		Several comms re budget issues and review of budget re same	1.10	896.50
11/19/24	MGR	B120B		Review DIP order and discuss budget w/ S Harding.	.50	435.00
11/20/24	BLP	B120B		Comms re variance report per DIP	.30	244.50
12/04/24	BLP	B120B		Review and forward to client Summit legal invoice	.10	81.50
12/05/24	BLP	B120B		Discussion with client re DIP loan accounts and questions on transfers to operating accounts, payments from account	.20	163.00
12/09/24	BLP	B120B		Comms re document request by BHs under DIP order	.20	163.00
12/10/24	BLP	B120B		Call with FTI re budget issues, BH questions on timing of budget items in prep for call with BHs	.50	407.50
12/10/24	BLP	B120B		Call with FTI and BHs re budget, effect of sales, timing of payments	.70	570.50
12/10/24	BLP	B120B		Call with client and FYI re budget, variations, cash flow	.80	652.00
12/10/24	MGR	B120B		Conf call with FTI regarding cash flow issues	.50	435.00
12/16/24	BLP	B120B		Review and comment on audit report for financial statements	.80	652.00
12/16/24	BLP	B120B		Conference with DV re comments to audit notes (.3); discussion with client re same (.2)	.50	407.50
12/17/24	BLP	B120B		Call with client and FTI re budget, financials, variances	.80	652.00
12/17/24	MGR	B120B		Participate in call with client and FTI	1.00	870.00
12/18/24	BLP	B120B		Review and circulate budget variance report	.30	244.50
12/23/24	BLP	B120B		Comms with Lenders and UST with audited financial statements	.20	163.00
1/16/25	BLP	B120B		Review and send variance report re DIP order	.30	244.50
TASK SUB TOTAL						\$ 30,323.50

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**B130B ASSET DISPOSITION, SALE OR RESTRUCTURE**

Date	Atty	Task	Actv	Description	Hours	Amount
10/10/24	BLP	B130B		Discussion with counsel for Authority re impact of filing on sales process	.20	163.00
10/10/24	MGR	B130B		Emails with B Pollack regarding sale motion and bond counsel comments.	.30	261.00
10/10/24	MGR	B130B		Phone conf w/ H Iselin counsel to the Pine Hills County authority regarding bankruptcy filing and email to client regarding substance of call.	.60	522.00
10/11/24	MGR	B130B		Email with JLL regarding HBCA interest and issues with contents of email	.50	435.00
10/11/24	MGR	B130B		Phone conf w/ T Colon of HBCA Foundation regarding acquisition of St Rose campus and review email from T Colon.	.70	609.00
10/16/24	BLP	B130B		Extensive revisions to sale motion based on BH comments and other comments	3.60	2,934.00
10/16/24	BLP	B130B		Comms with DIP lender re changes to sale motion	.30	244.50
10/16/24	BLP	B130B		Discussion with client re sale process	.30	244.50
10/16/24	MGR	B130B		E-mails with JLL regarding brokers opinion of value and need for board approval/review prior to publication.	.40	348.00
10/16/24	MGR	B130B		E-mails and voice mail to T Colon regarding interest in campus.	.30	261.00
10/16/24	MGR	B130B		E-mails with JLL regarding out reach to interested party HSBA and scheduling call to review marketing process.	.40	348.00
10/16/24	MGR	B130B		Review emails from D Carlos of JLL and discuss sales procedure motion with B Pollack.	.60	522.00
10/17/24	BLP	B130B		Discussion with JLL re BOV, sale process and communications with prior bidders	.60	489.00
10/17/24	MGR	B130B		Conf call with JLL team to review sales procedures and strategy.	.50	435.00



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Date	Atty	Task	Actv	Description	Hours	Amount
10/17/24	MGR	B130B		Phone conf w/ M White regarding need for board review of BOV.	.30	261.00
10/17/24	MGR	B130B		Phone conf w/ M White regarding update on calls w/ H Iselin and with JLL team.	.40	348.00
10/17/24	MGR	B130B		Review draft brokers opinion of value.	.60	522.00
10/17/24	MGR	B130B		Phone conf w/ H Iselin atty for the Pine Hills Authority regarding bankruptcy process and sales procedures	.40	348.00
10/18/24	MGR	B130B		Review revised BOV and emails with E Herman at JLL regarding same.	.80	696.00
10/21/24	BLP	B130B		Call with JLL and client re BOV and discussion of content and analysis	1.30	1,059.50
10/21/24	MGR	B130B		Conf call with Client, JLL and FTI team regarding broker opinion of value and issues regarding methodology and timing.	1.50	1,305.00
10/21/24	MGR	B130B		Review board minutes regarding issues related to ball field property and issues with Albany City and potential conflict with county offer	.50	435.00
10/21/24	DV	B130B		Meeting w/ client, FTI, and JLL re: BOV and analysis in connection w/ same.	1.50	592.50
10/22/24	BLP	B130B		Call with Executive Committee of Board re BOV	1.00	815.00
10/22/24	MGR	B130B		Prepare for and participate in special executive committee meeting regarding JLL BOV.	1.50	1,305.00
10/22/24	MGR	B130B		Emails w/ D Carlos and H Iselin regarding BOV and follow up with land authority regarding status of offer.	.30	261.00
10/23/24	BLP	B130B		Review timeline for Authority bid on property and comms re same; Comms with JLL/BHs re call to discuss BOV	.40	326.00
10/23/24	MGR	B130B		E-mail w/ H Iselin regarding BOV and potential call with JLL.	.30	261.00
10/23/24	MGR	B130B		E-mails w/ D Carlos regarding BOV and issues involving potential bidder HBCA Foundation.	.30	261.00
10/23/24	MGR	B130B		E-mails with party interested in acquiring campus	.20	174.00

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Date	Atty	Task	Actv	Description	Hours	Amount
10/23/24	DV	B130B		Emails re: communications re: BOV.	.20	79.00
10/24/24	BLP	B130B		Comms re Authority comments to BOV	.20	163.00
10/24/24	MGR	B130B		Prepare NDA for HBCA Foundation concerning interest in the property.	.50	435.00
10/24/24	MGR	B130B		E-mail to H Iselin regarding timeline and follow up phone conf regarding same	.40	348.00
10/24/24	MGR	B130B		Internal conversation regarding email/phone conf w/ atty for authority and email to client regarding same.	.50	435.00
10/25/24	MGR	B130B		Status call with JLL regarding marketing of property.	.70	609.00
10/25/24	DV	B130B		Conference call w/ JLL re: update from Authority and next steps.	.50	197.50
10/28/24	BLP	B130B		Comms re questions on BOV, inclusion of all properties	.20	163.00
10/28/24	MGR	B130B		Emails and phone confs regarding the Presidents house and inclusion in sale and potential buyers regarding same.	.70	609.00
10/29/24	BLP	B130B		Call with JLL re BOV in prep of BH call	.30	244.50
10/29/24	MGR	B130B		Conf call with JLL to prepare for call with bondholders and to update on sales process	.50	435.00
10/30/24	BLP	B130B		Conference with MR re Authority position on bidding, stalking horse etc.	.20	163.00
10/30/24	BLP	B130B		Prep for and participate in call with JLL and bondholders on BOV	.80	652.00
10/30/24	MGR	B130B		Conf call with bondholders and JLL regarding sales process update.	.80	696.00
10/30/24	MGR	B130B		Phone conf w/ H Iselin regarding status with Pine Hills Land Authority and bid process.	.40	348.00
10/30/24	MGR	B130B		Phone conf w/ P Pastore, bankruptcy counsel to the Pine Hills Land Authority regarding bid procedures and status of case.	.30	261.00
10/31/24	BLP	B130B		Comms re consignment agreements re pianos/art and BH questions re same	.40	326.00

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Date	Atty	Task	Activ	Description	Hours	Amount
11/01/24	MGR	B130B		Phone conf w/ P Pastore regarding Pine Hills Land Authority and process for decision to submit bid	.50	435.00
11/01/24	MGR	B130B		Email memo to client regarding conversation w/ P Pastore	.20	174.00
11/03/24	BLP	B130B		Comms with BHs re art schedules, appraisals	.30	244.50
11/04/24	BLP	B130B		Call with Authority counsel re stalking horse bids, sale process	.50	407.50
11/04/24	BLP	B130B		Review ad for sale of property and comment on same	.30	244.50
11/04/24	DV	B130B		Reviewed updated campus marketing materials (.2); emails re: same (.1).	.30	118.50
11/05/24	BLP	B130B		Discussion with client to clarify bid procedures, timeline	.20	163.00
11/05/24	BLP	B130B		Comms re piano sales	.20	163.00
11/05/24	BLP	B130B		Call with BHs re discussions with Authority re sale of property (.3); discussion with JLL re sale of tions re same baseball field parcels and questions re same (.2)	.50	407.50
11/05/24	MGR	B130B		Conf call with M Sato counsel for bonds holders and JLL team regarding sales process.	.50	435.00
11/05/24	MGR	B130B		Conf call with Pine Hill Land Authority regarding sales process.	.70	609.00
11/05/24	MGR	B130B		Update clients regarding calls with bond holders and Pine Hill Land Authority	.40	348.00
11/05/24	MGR	B130B		E-mails w/ H iselin regarding Pine Hills Land Authority outreach to bond holders and participation of J Nicolli	.30	261.00
11/06/24	BLP	B130B		Review limited objection to sale procedures filed by Authority and comms re same	.80	652.00
11/06/24	BLP	B130B		Review and revise timeline prepared by client for sale process	.30	244.50
11/07/24	MGR	B130B		Phone conf w/ H Iselin regarding Pine Valley Land Authority limited objection to the sales process and potential stalking horse bid.	.50	435.00

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Date	Atty	Task	Actv	Description	Hours	Amount
11/07/24	MGR	B130B		E-mail to JLL team regarding interest of Hilco in touring campus with potential purchaser.	.30	261.00
11/07/24	MGR	B130B		Phone conf w/ J Hubbard and C Koulichkov regarding potential interest in campus and ability to tour/receive commission.	.60	522.00
11/07/24	MGR	B130B		Phone conf w/ atty for city of Albany regarding acquisition of baseball field lots.	.30	261.00
11/08/24	BLP	B130B		Prepare reply to Authority limited objection and several comms re same	3.10	2,526.50
11/08/24	BLP	B130B		Comms with BHs negotiating deal on piano sales and revise order re same	.60	489.00
11/08/24	BLP	B130B		Discussion with Authority counsel re bid process, questions on procedures, objection and response (.2); comms with client re same (.2)	.40	326.00
11/08/24	MGR	B130B		Review bidding procedures and discuss stalking horse bids on partial property offers with JLL team.	.50	435.00
11/08/24	MGR	B130B		E-mails and Phone conf w/ D Khosla regarding potential interest in a portion of campus.	.60	522.00
11/08/24	MGR	B130B		Review and comment on changes to reply to PHLA objection to bidding procedures.	.50	435.00
11/08/24	DV	B130B		Emails w/ B. Pollack re: Authority call re: bid procedures and related comments.	.30	118.50
11/08/24	DV	B130B		Reviewed and revised response to Authority objection (.4); emails w/ B. Pollack re: same (.2).	.60	237.00
11/09/24	DV	B130B		Emails w/ M. Roseman and B. Pollack re: meeting to discuss Authority matters.	.20	79.00
11/11/24	BLP	B130B		Review law re standing to object to sale procedures and conference with KC re further research on same	.50	407.50
11/11/24	BLP	B130B		Call with client re Authority objection, process, issues	.50	407.50
11/11/24	BLP	B130B		Call with Executive Committee of CSR re issues with Authority, objection, bidding issues	1.30	1,059.50

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Date	Atty	Task	Actv	Description	Hours	Amount
11/11/24	BLP	B130B		Call with BHs re Authority objection, hearing (.3); conference re standing issues re procedures (.2)	.50	407.50
11/11/24	MGR	B130B		Phone conf w/ B Pollack regarding strategy session concerning Pine Hills Land Authority issues with bidding procedures.	.40	348.00
11/11/24	MGR	B130B		Preparation call with M White and J Stone regarding EC meeting regarding Pine Hills Land Authority and issues with bidding procedures.	.60	522.00
11/11/24	MGR	B130B		Conf call with EC Committee regarding Pine Valley Land Authority issues.	1.50	1,305.00
11/11/24	MGR	B130B		Phone conf w/ H Iselin regarding reply to objection of PHLA and setting up conf call to discuss.	.40	348.00
11/12/24	BLP	B130B		Call with client and Authority re objection, process issues, negotiation of same	.80	652.00
11/12/24	BLP	B130B		Debrief call with client re Authority objection issues and strategy	1.00	815.00
11/12/24	BLP	B130B		Discussion with JLL re hearing prep, Authority issues	.40	326.00
11/12/24	MGR	B130B		Prepare for and participate in call with PHLA and select College board members regarding objection to bid procedures and potential resolution of object	1.50	1,305.00
11/12/24	MGR	B130B		Participate in de-briefing call with M White, N Massry, J Barba and B Pollack regarding call with PHLA and positions to take in court appearance regarding sales procedures	1.20	1,044.00
11/12/24	MGR	B130B		Review case law regarding potential bidders standing to object to bid procedures.	.50	435.00
11/12/24	DV	B130B		Attention to sales process and objections.	1.00	395.00
11/12/24	DV	B130B		Meeting w/ M. White and Trustees re: same.	1.00	395.00
11/12/24	KC	B130B		Research re: standing to object to 363 sales and proposed bid procedures.	1.80	738.00
11/13/24	BLP	B130B		Revise sale timeline based on hearing	.20	163.00

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Date	Atty	Task	Actv	Description	Hours	Amount
11/13/24	MGR	B130B		Phone conf w/ B Williams attorney at the City of Albany regarding the proposed bidding procedures and City of Albany's interest in certain lots impacting baseball field.	.40	348.00
11/13/24	MGR	B130B		Phone conf w/ F Brennan counsel to the board of trustees regarding contact with the PHLA by individual board members and need to maintain negotiations through the College attorneys.	.40	348.00
11/13/24	DV	B130B		Attention to hearing on sale/bidding procedures.	1.50	592.50
11/13/24	DV	B130B		Meetings w/ M. Roseman to discuss bid procdures.	.50	197.50
11/14/24	BLP	B130B		Discussions with several potential bidders re process, contact at JLL	.40	326.00
11/14/24	BLP	B130B		Finalize and file sale procedures order	.40	326.00
11/14/24	BLP	B130B		Call with JLL re process questions, strategy in marketing	.50	407.50
11/14/24	BLP	B130B		Comms with court re sale hearing	.20	163.00
11/14/24	BLP	B130B		Several comms re procedures order, changes to same, logistics on dates of hearings (.3); conferences with DV re process questions re same (.2)	.50	407.50
11/14/24	MGR	B130B		Prepare for and participate in conf call with JLL team to review procedures of sale/bidding and continued outreach to bidders.	1.00	870.00
11/14/24	MGR	B130B		Conf w/ D Vespia and B Pollack to discuss approach with PHLA and strategy with outreach.	.50	435.00
11/14/24	MGR	B130B		Phone conf w/ C Kernozek regarding interest in purchasing personal property (.1); email to client regarding same (.2)	.30	261.00
11/15/24	BLP	B130B		Comms with Lender re date of sale hearing, logistical issues	.20	163.00
11/15/24	MGR	B130B		Phone conf w/ Hilco team regarding potential offer.	.50	435.00
11/18/24	MGR	B130B		Phone conf w/ party interested in purchasing athletic equipment and related apparel and email client regarding same.	.40	348.00

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THE COLLEGE OF SAINT ROSE  
File Number: 22484-000-3

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Date	Atty	Task	Actv	Description	Hours	Amount
11/19/24	BLP	B130B		Discussion with possible purchaser of personalty, books re property, procedures	.20	163.00
11/20/24	MGR	B130B		Review 2 revised NDA's for potential bidders and provide comments.	.80	696.00
11/20/24	MGR	B130B		Email with party interested in purchasing assets.	.30	261.00
11/21/24	BLP	B130B		Comms with Authority re APA schedules	.20	163.00
11/21/24	BLP	B130B		Discussion with JLL re auction prep, logistics, credit bidding, etc.	.70	570.50
11/21/24	MGR	B130B		E-mails with JLL team regarding scheduling bond holder meeting and form of NDA for potential bidders.	.30	261.00
11/21/24	MGR	B130B		Conf call with JLL team regarding auction process and potential allocation of sales proceeds issues.	1.00	870.00
11/21/24	MGR	B130B		Phone conf w/ party interested in purchasing personal property	.30	261.00
11/21/24	MGR	B130B		E-mails w/ P Pastore counsel to PHLA regarding bid issues and related emails to client regarding Phase 1.	.40	348.00
11/22/24	BLP	B130B		Comms re environmental reports for property (.3); comms re questions on deposits for other bidders, charitable organization request for no deposit (.2)	.50	407.50
11/22/24	BLP	B130B		Several comms with client, Authority, FTJ, JLL re credit bid issues, sale process, call with Authority re bid	.70	570.50
11/22/24	MGR	B130B		Phone conf w/ JLL team regarding sales process and related issues.	.70	609.00
11/22/24	MGR	B130B		Phone conf w/ H Iselin regarding meeting with PHLA to present proposal on the acquisition of campus.	.30	261.00
11/22/24	MGR	B130B		Phone conf w/ M white regarding outreach from PHLA and strategy concerning same.	.50	435.00
11/22/24	MGR	B130B		Internal emails regarding PHLA call and scheduling de-brief call.	.40	348.00
11/22/24	MGR	B130B		Bond holders status call with JLL.	.90	783.00
11/22/24	MGR	B130B		Draft update email to client regarding same.	.30	261.00

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THE COLLEGE OF SAINT ROSE  
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Date	Atty	Task	Actv	Description	Hours	Amount
11/22/24	DV	B130B		Attention to Phase I report and distribution of same (.4); emails w/ JLL re: same (.2).	.60	237.00
11/24/24	MGR	B130B		Emails with H Iselin, D Vespia and clients regarding call with PHLA.	.50	435.00
11/24/24	DV	B130B		Emails re: meeting w/ Pine Hills Land Authority	.30	118.50
11/25/24	BLP	B130B		Call with Authority re bid and basis for same	.30	244.50
11/25/24	BLP	B130B		Debrief call with board, JLL, FTI re Authority bid and strategy re same	.70	570.50
11/25/24	BLP	B130B		Comms re wire from bidder, bid submitted	.20	163.00
11/25/24	MGR	B130B		Conf call w/ PHLA to receive bid for campus.	.70	609.00
11/25/24	MGR	B130B		De-brief call with board regarding offer, need to advise bond holders and Summit and strategy moving forward.	1.00	870.00
11/25/24	MGR	B130B		Internal calls to arrange for Albany office to hold auction.	.50	435.00
11/25/24	MGR	B130B		E-mail to M Sato regarding PHLA bid	.20	174.00
11/25/24	DV	B130B		Attention to correspondence re: meeting w/ Pine Hills Land Authority	.30	118.50
11/25/24	DV	B130B		Attended meeting w/ client and Pine Hills Land Authority	.40	158.00
11/25/24	DV	B130B		Meeting w/ client re: PHLA bid.	.70	276.50
11/25/24	DV	B130B		Internal meeting re: PHLA bid.	.20	79.00
11/25/24	DV	B130B		Attention to emails re: DIP lender discussion	.20	79.00
11/26/24	BLP	B130B		Comms re BH response to Authority bid, credit bid issues, call with BH counsel re same	.40	326.00
11/26/24	MGR	B130B		Phone conf and e-mail to H Iselin counsel to PHLA regarding bondholder response/reaction to PHLA bid.	.70	609.00
11/26/24	MGR	B130B		Phone conf w/ M White regarding conversations had with M Sato and H Iselin.	.40	348.00
11/26/24	MGR	B130B		Phone conf w/ D Carlos regarding bondholder reaction to PHLA bid and auction strategy.	.40	348.00



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Date	Atty	Task	Actv	Description	Hours	Amount
11/26/24	MGR	B130B		E-mails w/ N Massry (board of trustee member) regarding PHLA bid and status	.30	261.00
11/26/24	MGR	B130B		Phone conf w/ M Sato regarding PHLA bid and potential upcoming auction.	.50	435.00
11/26/24	MGR	B130B		Draft email to client and board regarding response to bid	.30	261.00
11/27/24	BLP	B130B		Review mark up of purchase agreements by Authority and comms re same	.80	652.00
11/29/24	MGR	B130B		Conf call w/ H Iselin, M Sato and S Gumbs regarding campus sale, bids and process with look towards reaching consensual sale.	1.00	870.00
11/29/24	MGR	B130B		Phone conf w/ M White regarding her conversations with PHLA K O'Connor and potential ability to increase bid.	.30	261.00
11/29/24	MGR	B130B		E-mail updating outcome of conf call with H Iselin, S Gumbs and M Sato regarding PHLA bid and sales process.	.30	261.00
11/29/24	DV	B130B		Attention to emails re: authority bid.	.20	79.00
12/01/24	MGR	B130B		Conf call w/ client, FTI and JLL to recap call with PHLA and bond holder counsel and to consider a counter offer.	1.00	870.00
12/02/24	BLP	B130B		Conference with MR re discussions with Authority re stalking horse bid (.3); discussion with JLL re additional questions from bidders (.2)	.50	407.50
12/02/24	BLP	B130B		Conference with C. Mullen re review of changes proposed by Authority to contract (.3); comms with lenders re PLG bid (.2)	.50	407.50
12/02/24	BLP	B130B		Calls with BH counsel re bids, procedures and auction	.70	570.50
12/02/24	BLP	B130B		Meeting with MR re call with BHs and strategy re auction in light of same	.40	326.00
12/02/24	BLP	B130B		Comms re DIP lender call re bidding and bids (.2); discussion with P. Pastore re questions on auction process (.2)	.40	326.00

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Date	Atty	Task	Actv	Description	Hours	Amount
12/02/24	BLP	B130B		Review FTI illustrative recoveries from auction and conferences re same	.60	489.00
12/02/24	BLP	B130B		Discussion with Summit counsel re status of bidding, authority bid	.40	326.00
12/02/24	BLP	B130B		Lengthy call with client, FTI re counterproposal to authority re potential stalking horse bid	1.00	815.00
12/02/24	MGR	B130B		Conf call with bond holder counsel regarding auction procedures and structure.	.80	696.00
12/02/24	MGR	B130B		Conf call with Summit counsel regarding case status and bids	.50	435.00
12/02/24	MGR	B130B		Conf call with executive committee regarding formulating counter offer to the PHLA.	1.00	870.00
12/02/24	MGR	B130B		Conf call with H Iselin and S Gumbs regarding counter proposal on acquisition of campus property.	.50	435.00
12/02/24	MGR	B130B		E-mail to M White regarding conversation with H Iselin	.30	261.00
12/03/24	BLP	B130B		Conference with MR re further discussions with Authority and counterproposal	.30	244.50
12/03/24	BLP	B130B		Call with counsel to Authority re questions on auction, credit bidding, formal notification of bids, etc.	.60	489.00
12/03/24	BLP	B130B		Conference with MR re logistical issue on bidding by Authority, other bids, board review of bids	.30	244.50
12/03/24	BLP	B130B		Call with client and FTI re bid and auction scenarios and distributions scenarios as a result	.80	652.00
12/03/24	MGR	B130B		Review proposed mark up of APA and discuss personal property issue with B Pollack.	.70	609.00
12/03/24	MGR	B130B		E-mails with JLL regarding bid procedures and bid qualifications.	.50	435.00
12/04/24	BLP	B130B		Discussion with C. Mullen re Authority changes to contract, real estate issues	.40	326.00
12/04/24	BLP	B130B		Revise Authority markup re agreed changes or issues and email to authority re same	1.00	815.00

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Date	Atty	Task	Activ	Description	Hours	Amount
12/04/24	BLP	B130B		Conferences with MR re auction prep needed	.30	244.50
12/04/24	BLP	B130B		Comms re call with Artist Piano and BHs re piano sales	.20	163.00
12/04/24	BLP	B130B		Call with client, FTI, JLL re auction prep/process	1.10	896.50
12/04/24	BLP	B130B		Discussion with counsel to the Authority re changes to sale agreement and further comms re same	.30	244.50
12/04/24	MGR	B130B		Conf call to follow up on bid status with JLL, FTI and M White;	.70	609.00
12/04/24	MGR	B130B		Review changes to the proposed changes to APA by PHLA and discuss same w/ B Pollack.	.70	609.00
12/04/24	MGR	B130B		Review JLL progress report on bids and prepare for call with client, FTI and JLL.	.40	348.00
12/04/24	MGR	B130B		Conf w/ Albany office regarding logistics for auction on 12/12.	.50	435.00
12/05/24	BLP	B130B		Comms re counsel to authority re bid, contract (.2); comms with MR re same and additional information needed for bid sheet (.2)	.40	326.00
12/05/24	BLP	B130B		Several comms with parties in interest re schedules to APAs	.80	652.00
12/05/24	BLP	B130B		Discussions with JLL re changes needed to bid sheets (.2); comms with authority and client re authority changes to contract and negotiation of same (.2)	.40	326.00
12/05/24	BLP	B130B		Comms with client re timing of deliverables to authority under proposed contract and issues with same (.2); several, comms re deposits under contracts, W9s, bids, etc. (.4)	.60	489.00
12/05/24	BLP	B130B		Revise authority markup per negotiations with authority and circulate same for review	.50	407.50
12/05/24	MGR	B130B		E-mails w/ N Massry and D Carlos regarding potential interest in bidding.	.30	261.00
12/05/24	MGR	B130B		E-mails w/ D Carlos regarding auction issues and follow up call with B Pollack regarding same	.50	435.00

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Date	Atty	Task	Actv	Description	Hours	Amount
12/06/24	BLP	B130B		Numerous comms and conferences throughout day re bids received, deposits received, Authority bid, BH reservation of rights, Summit questions on same etc.	2.90	2,363.50
12/06/24	BLP	B130B		Call with client, Executive Committee re bids, process	.50	407.50
12/06/24	MGR	B130B		Review bid package of PHLA.	.50	435.00
12/06/24	MGR	B130B		Review and respond to email from I Hammel regarding bond holders intent to credit bid.	.30	261.00
12/06/24	MGR	B130B		Phone conf w/ H Iselin regarding PHLA bid and openness of Authority to parse off parcels to increase effective amount of purchase price.	.40	348.00
12/06/24	MGR	B130B		Emails w/ trustee Sharon Duker regarding PHLA bid.	.30	261.00
12/06/24	MGR	B130B		Receipt and review the bid package for 956 and 962 Madison Ave.	.40	348.00
12/06/24	MGR	B130B		Review bid package of Douglas Development and email question to JLL.	.40	348.00
12/06/24	MGR	B130B		Review reservation of rights filed by the bond holder regarding credit bid	.30	261.00
12/06/24	DV	B130B		Attention to numerous emails re: bids and auction process.	1.40	553.00
12/07/24	BLP	B130B		Several comms re bids, deposits, allocation of purchase price and setting up call with Summit and JLL	1.20	978.00
12/07/24	MGR	B130B		Review detailed bid analysis received from JLL team.	1.00	870.00
12/07/24	MGR	B130B		Outline bid structure in preparation for auction.	.70	609.00
12/07/24	MGR	B130B		E-mails w/ B Pollack regarding circulation of detailed bid analysis.	.30	261.00
12/07/24	DV	B130B		Attention to email re: bid allocation and negotiation strategy.	.20	79.00
12/08/24	BLP	B130B		Call with Summit and JLL re bidding, procedures, auction	.40	326.00
12/08/24	BLP	B130B		Call with JLL re bidding questions	.30	244.50

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Date	Atty	Task	Actv	Description	Hours	Amount
12/08/24	BLP	B130B		Call with MR re sale process and questions raised by bidders	.30	244.50
12/08/24	MGR	B130B		Conf call with Summit group and JLL team regarding bid analysis	.50	435.00
12/09/24	BLP	B130B		Call with both lenders re auction and bid process and strategy re same	1.00	815.00
12/09/24	BLP	B130B		Call with client re auction prep, walk through of process	1.00	815.00
12/09/24	BLP	B130B		Call with BHs and Artist Pianos re piano sales and questions of BHs	.30	244.50
12/09/24	BLP	B130B		Follow up comms with MR and client re call with lenders re auction process and strategy	.40	326.00
12/09/24	MGR	B130B		Conf call w/ bond Holder and Summit to review auction process and open issue.	.70	609.00
12/09/24	MGR	B130B		Review and respond to emails from JLL regarding auction process	.30	261.00
12/09/24	MGR	B130B		Phone conf w/ M White regarding informal contact with the PHLA and need to maintain structured communications.	.50	435.00
12/09/24	MGR	B130B		Phone conf w/ H Iselin attorney for PHLA concerning auction process and bidding structure (.2); Discussions regarding ability to increase bid or carve out certain properties (.2)	.40	348.00
12/09/24	DV	B130B		Discussions w/ M. Roseman and B. Pollack re: bondholder/Summit call.	.40	158.00
12/09/24	DV	B130B		Meeting to discuss upcoming auction and related matters.	1.40	553.00
12/09/24	DV	B130B		Telephone call w/ B. Pollack re: auction.	.30	118.50
12/10/24	BLP	B130B		Prepare auction rules, announcements and several comms re same	1.40	1,141.00
12/10/24	BLP	B130B		Conferences and comms re revised Jerusalem bid, auction strategy in light of same	.60	489.00

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Date	Atty	Task	Actv	Description	Hours	Amount
12/10/24	BLP	B130B		Comms re Jerusalem deposit, financial wherewithal documents (.2); discussion with DIP counsel re auction process, procedures (.3)	.50	407.50
12/10/24	MGR	B130B		Review Jerusalem Management bid and emails with JLL and lender group regarding same.	.70	609.00
12/10/24	MGR	B130B		Review auction announcement and make changes.	.50	435.00
12/10/24	MGR	B130B		Phone conf w/ H Iselin regarding sales process and update on respective positions.	.50	435.00
12/10/24	MGR	B130B		Revise bid schedules and prepare for auction.	.70	609.00
12/10/24	MGR	B130B		Phone conf w/ P Pastore regarding auction process and location timing and related issues.	.40	348.00
12/10/24	MGR	B130B		Phone confs w/ M White regarding conversations with H Iselin, P Pastore and D Carlos regarding sales process.	.50	435.00
12/10/24	DV	B130B		Emails and telephone call w/ B. Pollack and M. Hrankiowskyj re: RPT exemption status.	.40	158.00
12/10/24	DV	B130B		Meeting w/ College leadership and consultants in preparation for auction.	1.20	474.00
12/10/24	DV	B130B		Emails re: auction prep and setup.	.40	158.00
12/11/24	BLP	B130B		Several comms re bid packages, information in same, review of qualifications in prep for auction	1.20	978.00
12/11/24	BLP	B130B		Discussion with DIP counsel re Jerusalem bids (.2); revise auction rules and announcements (.4)	.60	489.00
12/11/24	BLP	B130B		Prepare form for notice of successful bidder	.40	326.00
12/11/24	BLP	B130B		Call with client, JLL, FTI re auction prep	.50	407.50
12/11/24	BLP	B130B		Several comms re court reporter issues for auction, remote only, attempts to find in person reporter	.30	244.50
12/11/24	MGR	B130B		Review bid packages and update notes in preparation for auction sale.	1.50	1,305.00
12/11/24	DV	B130B		Attention to auction preparation.	.80	316.00
12/12/24	BLP	B130B		Prepare for and attend all day auction	7.50	6,112.50

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Date	Atty	Task	Actv	Description	Hours	Amount
12/12/24	BLP	B130B		Debrief meeting with client after auction and outcome	1.50	1,222.50
12/12/24	MGR	B130B		Prepare auction and review process for conducting auction w/ clients.	1.50	1,305.00
12/12/24	MGR	B130B		Conduct auction at offices of Cullen and Dykman, Caucus with bidders and consultation parties regarding offers and sale structure strategy.	6.50	5,655.00
12/12/24	MGR	B130B		Conf regarding confirmation of sale hearing and necessary steps regarding same w/ B Pollack and D Vespia.	.80	696.00
12/12/24	MGR	B130B		Post auction meeting with clients to discuss outcome and next steps.	.70	609.00
12/12/24	DV	B130B		Prepared for and attended real estate auction.	7.50	2,962.50
12/13/24	BLP	B130B		Prepare and file notice of successful bidders	.60	489.00
12/13/24	BLP	B130B		Revise two sale order re results of auction	1.70	1,385.50
12/13/24	BLP	B130B		Comms with JLL re information for return of deposits (.2); comms with C. Mullen re schedules to APAs (.2)	.40	326.00
12/13/24	BLP	B130B		Revise notice of successful bidders re court request and refile same	.40	326.00
12/13/24	BLP	B130B		Several comms with lenders and client re sale orders	.50	407.50
12/13/24	MGR	B130B		Review and provide comments to orders approving sale of campus and sale of presidents house.	.70	609.00
12/13/24	DV	B130B		Reviewed notice of successful bids.	.20	79.00
12/14/24	MGR	B130B		Review DIP lender comments to sales orders	.60	522.00
12/16/24	BLP	B130B		Review of and revisions to Becker contract	2.10	1,711.50
12/16/24	BLP	B130B		Additional revisions to Authority contract	.90	733.50
12/16/24	BLP	B130B		Several comms with DIP lender and BHs re their proposed changes to sale orders	.90	733.50
12/16/24	BLP	B130B		Comms with client and buyers re information for APA schedules, revised contracts	.50	407.50
12/16/24	BLP	B130B		Comms re return of deposits and information for same	.40	326.00

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Date	Atty	Task	Actv	Description	Hours	Amount
12/16/24	MGR	B130B		Conf call w/ I Hamel and B Pollack regarding sale order and issues related to proceeds of sale of Presidents house.	.50	435.00
12/16/24	MGR	B130B		Phone conf w/ P Pastore counsel to PHLA regarding contract issues, schedules and hearing regarding good faith purchaser finding.	.40	348.00
12/16/24	MGR	B130B		Review draft sales order and comments from bond holder counsel.	.40	348.00
12/16/24	MGR	B130B		Discuss same with B Pollack.	.30	261.00
12/16/24	MSE	B130B		Conference with B. Pollack re: review of asset purchase agreements for campus sale.	.10	64.00
12/16/24	MSE	B130B		Begin review of Authority Asset Purchase Agreement.	1.40	896.00
12/17/24	BLP	B130B		Extensive negotiation and discussions with 2 lenders re requested changes to sale orders and revise orders accordingly	3.70	3,015.50
12/17/24	BLP	B130B		Continued revisions to APAs based on parties comments and preparation of schedules to same	1.50	1,222.50
12/17/24	BLP	B130B		Several comms re return of deposits, wire information	1.10	896.50
12/17/24	MGR	B130B		Review proposed changes to sale orders and discuss same w/ B Pollack.	.70	609.00
12/17/24	MGR	B130B		Phone conf w/ P Pastore regarding transfer tax issue and suggested modification to sale order for campus.	.40	348.00
12/17/24	MGR	B130B		E-mails w/ B Pollack regarding further modification of sale order to address transfer tax issue.	.30	261.00
12/17/24	MGR	B130B		E-mails with P Pastore re scheduling meeting with clients to review contract issues regarding sale of campus.	.30	261.00
12/17/24	MSE	B130B		Prepare for and attend video conference with B. Pollack and client working group to discuss APA schedules.	.70	448.00
12/17/24	MSE	B130B		Draft of comments to Authority APA.	1.30	832.00
12/17/24	MSE	B130B		Review of Becker APA.	1.20	768.00



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12/17/24	MSE	B130B		Draft of comments to Becker APA.	.80	512.00
12/17/24	MSE	B130B		Conference with B. Pollack re: comments to APA.	.10	64.00
12/18/24	BLP	B130B		Discussions with DIP counsel re revisions to contracts (.2); discussion with M. White re changes to Authority contract and status of same (.2)	.40	326.00
12/18/24	BLP	B130B		Conference with M. Eng re new revisions to contract by authority	.60	489.00
12/18/24	BLP	B130B		Call with authority negotiating latest revisions to contract	.70	570.50
12/18/24	BLP	B130B		Revisions to Authority contract re latest negotiations	1.20	978.00
12/18/24	BLP	B130B		Finalize and file sale orders with blacklined copies of same	.80	652.00
12/18/24	BLP	B130B		Review and comms re additional changes requested to Becker agreement and revise same accordingly	1.10	896.50
12/18/24	BLP	B130B		Continued return of deposits and review of wires	.30	244.50
12/18/24	BLP	B130B		Several comms with JLL re hearing, marketing update for use at hearing	.30	244.50
12/18/24	MGR	B130B		Review redlined APA regarding sale to PHLA of campus in preparation for call with PHLA counsel.	.70	609.00
12/18/24	MGR	B130B		Conf call with PHLA counsel regarding comments to APA and legal issues.	1.00	870.00
12/18/24	MGR	B130B		Review comments to APA from M Eng and discuss issues resolved by bankruptcy court order.	.50	435.00
12/18/24	MSE	B130B		Review of Authority comments to APA.	.70	448.00
12/18/24	MSE	B130B		Attend video conference with B. Pollack and M. Roseman to discuss Authority comments to APA.	.60	384.00
12/18/24	MSE	B130B		Attend video conference with B. Pollack, M. Roseman and counsel for Albany Authority to discuss APA.	.40	256.00
12/18/24	MSE	B130B		Phone call with Authority real estate counsel on re-draft of APA.	.30	192.00
12/18/24	MSE	B130B		Edits and review of Becker APA.	.50	320.00

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Date	Atty	Task	Actv	Description	Hours	Amount
12/18/24	MSE	B130B		Review of updated buyer comments to Authority APA.	.40	256.00
12/18/24	MSE	B130B		Draft of comments to Authority APA.	.80	512.00
12/19/24	BLP	B130B		Review further authority contract changes and comms re same	.30	244.50
12/19/24	BLP	B130B		Finalize and circulate Authority contract without schedules	.70	570.50
12/19/24	BLP	B130B		Work on APA schedules and comms re same	1.70	1,385.50
12/19/24	BLP	B130B		Work on schedules for Becker APA	.80	652.00
12/19/24	BLP	B130B		Meeting with Authority and client re logistical issues for closing, document deliverables	1.00	815.00
12/19/24	BLP	B130B		Call with FTI and follow up with client re meeting with authority and logistical issues for closing	1.30	1,059.50
12/19/24	MGR	B130B		Meeting with Pine Hills Land Authority to discuss process and issues with sale of property	1.00	870.00
12/19/24	MGR	B130B		Meeting with client regarding to remaining issues in bankruptcy process and immediate issues regarding potential rapid closing of transaction	1.50	1,305.00
12/19/24	MSE	B130B		Review of updated buyer comments to Authority APA.	.40	256.00
12/19/24	MSE	B130B		Correspondence with B. Pollack and buyer's counsel re: response to buyer comments to Authority APA.	.10	64.00
12/19/24	MSE	B130B		Phone call with B. Pollack and M. Roseman re: disclosures and APAs.	.10	64.00
12/20/24	BLP	B130B		Upload sale orders (.2); comms with client re early closing possible and effect on gains taxes (.2); comms with Authority re approval of schedules to agreement (.1)	.50	407.50
12/20/24	BLP	B130B		Review signed sale orders and circulate to all (.2); discussions re whether residential disclosure needed (no) (.3)	.50	407.50
12/23/24	BLP	B130B		Continued and final return of deposits including letter to City of Albany with check	.40	326.00

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Date	Atty	Task	Actv	Description	Hours	Amount
12/23/24	BLP	B130B		Continued comms with Authority re schedules to APA and review proposed substitution of schedule	.50	407.50
12/23/24	BLP	B130B		Comms with Authority, BHs, summit re executed Authority agreement	.20	163.00
12/23/24	MSE	B130B		Conference with C. Mullen re: APA disclosures.	.10	64.00
12/23/24	MSE	B130B		Correspondence with B. Pollack re: APA disclosures.	.10	64.00
12/23/24	MSE	B130B		Review of schedules.	.50	320.00
12/23/24	MSE	B130B		Correspondence with B. Pollack re: review of schedules.	.10	64.00
12/26/24	BLP	B130B		Comms with client and purchaser re signatures needed on Becker agreement (.2); comms re escrow reconciliation (.2)	.40	326.00
12/27/24	BLP	B130B		Comms with client re assumption of contracts under purchase agreements	.20	163.00
12/27/24	BLP	B130B		Comms with JLL re Jerusalem deposit issues and return of money	.30	244.50
12/27/24	MGR	B130B		Emails regarding to issues surrounding wire transfers related to return of bidder deposits.	.30	261.00
12/30/24	BLP	B130B		Comms with Becker re assumption of contracts (.1); comms with Authority re contracts, timing, etc. (.2); comms re interested party for personal property sales (.2).	.50	407.50
1/02/25	BLP	B130B		Several comms with Authority and MR re timing of closing, bond issuance, leases and contracts	.60	489.00
1/02/25	MGR	B130B		Review transcript of auction	1.00	870.00
1/02/25	DV	B130B		Attention to emails re: Authority assumption of contracts/leases	.60	237.00
1/02/25	DV	B130B		Reviewed leases in connection w/ same	.40	158.00
1/03/25	MGR	B130B		Continued review and make corrections to transcript of auction.	1.50	1,305.00

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Date	Atty	Task	Actv	Description	Hours	Amount
1/06/25	BLP	B130B		Comms with client and Authority re leases of real property, all terminated pre-petition (.3); comms with Becker, client and Summit re fully executed Becker agreement (.2)	.50	407.50
1/06/25	BLP	B130B		Discussion with client re Authority access to property pre-closing and review agreement re same	.40	326.00
1/07/25	BLP	B130B		Conference with MR re Authority process, access, issues and call with client (.3); follow up call with M. White re property access on Thursday by Authority, insurance (.1)	.40	326.00
1/07/25	BLP	B130B		Prepare agenda for meeting with Authority and comms re same	.40	326.00
1/07/25	DV	B130B		Attention to agenda for meeting w/ Authority.	.20	79.00
1/08/25	BLP	B130B		Discussion with M. Eng re meeting with Authority, issues re access, etc. (.3) ; follow up discussion with MR and M. Eng after call with client re same (.2)	.50	407.50
1/08/25	BLP	B130B		Discussion with DV and M. White in preparation for Authority meeting, agenda, access issues, etc.	.30	244.50
1/08/25	BLP	B130B		Review President's house title report and forward to M. Eng	.30	244.50
1/08/25	DV	B130B		Emails w/ B. Pollack re: Authority meeting	.20	79.00
1/08/25	DV	B130B		Prep meeting for meeting with the Authority	.80	316.00
1/08/25	MSE	B130B		Conference with B. Pollack re: access to campus and title reports.	.20	128.00
1/08/25	MSE	B130B		Review of Authority APA in preparation of 1/9 call.	.20	128.00
1/09/25	BLP	B130B		Comms with client re piano/art sale reconciliation for BHs (.2); response to BH email re sales, personal property, taxes (.2)	.40	326.00
1/09/25	BLP	B130B		Discussion with client re piano chart and questions on information re same	.20	163.00
1/09/25	BLP	B130B		Call with client and Authority re process, access, contracts, personal property, logistics	.90	733.50

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Date	Atty	Task	Activ	Description	Hours	Amount
1/09/25	BLP	B130B		Conference with M. Eng re Authority access agreement and email to client re same (.3); comms with T. Owens re call re same (.1)	.40	326.00
1/09/25	DV	B130B		Attended meeting w/ Albany Pine Hills Land Authority	1.00	395.00
1/09/25	DV	B130B		Emails w/ D. Polley and B. Diaz re: real property tax exemption renewals	.30	118.50
1/09/25	MSE	B130B		Review of APA and review of agenda in preparation of all-hands call between client, Albany county executive team, Albany Land Authority, counsel, B. Pollack, M. Roseman and D. Vespia.	.20	128.00
1/09/25	MSE	B130B		Attend video conference with client, Albany county executive team, Albany Land Authority, counsel, B. Pollack, M. Roseman and D. Vespia.	1.00	640.00
1/09/25	MSE	B130B		Conference with B. Pollack re: access agreement with County and Alliance.	.20	128.00
1/10/25	BLP	B130B		Comms with BHs re piano/art sales and W9 request	.20	163.00
1/10/25	BLP	B130B		Call with M. Eng and T. Owens re Authority access agreement, terms (.3); follow up discussion with M. Eng re same (.2)	.50	407.50
1/10/25	MGR	B130B		Review schedule relating to personal property sales.	.30	261.00
1/10/25	MSE	B130B		Attend video conference with B. Pollack and Authority counsel re: access agreement.	.20	128.00
1/10/25	MSE	B130B		Phone call with Authority counsel re: access agreement.	.20	128.00
1/10/25	MSE	B130B		Conference with B. Pollack re: access agreement.	.10	64.00
1/10/25	MSE	B130B		Begin draft of access agreement.	.40	256.00
1/13/25	MGR	B130B		Draft email to C Becker regarding the purchase of furniture in presidents house.	.50	435.00
1/13/25	MSE	B130B		Continue draft of access agreement.	.40	256.00
1/14/25	BLP	B130B		Review and revise access agreement with authority and comms with client re same	.60	489.00
1/14/25	BLP	B130B		Discussion with Eng re draft access agreement	.20	163.00

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Date	Atty	Task	Actv	Description	Hours	Amount
1/14/25	BLP	B130B		Further emails with Eng and authority re comments to agreement, insurance	.50	407.50
1/14/25	BLP	B130B		Comms re Authority requests for financial information, run rates, etc. and response	.30	244.50
1/14/25	DV	B130B		Attention to draft access agreement and emails re: same.	.70	276.50
1/14/25	MSE	B130B		Finalize draft of County access agreement.	1.20	768.00
1/14/25	MSE	B130B		Conference with B. Pollack re: County access agreement.	.20	128.00
1/14/25	MSE	B130B		Review of APA re: delivery of operations budget.	.40	256.00
1/14/25	MSE	B130B		Correspondence with B. Pollack and client re: delivery of operations budget to purchaser.	.20	128.00
1/15/25	MSE	B130B		Review County comments to County license agreement.	.10	64.00
1/16/25	DV	B130B		Emails w/ B. Pollack and M. Hrankiowskyj re: real property tax exemption renewals	.20	79.00
1/16/25	DV	B130B		Telephone call w/ M. Hrankiowskyj re: same	.20	79.00
1/16/25	DV	B130B		Attention to emails re: Pine Hills Neighborhood Association meeting	.30	118.50
1/16/25	DV	B130B		Telephone call w/ D. Polley re: same	.20	79.00
1/16/25	MSE	B130B		Conference with B. Pollack re: closing of sale to Becker.	.10	64.00
1/17/25	BLP	B130B		Review proposed changes to access agreement by authority and comms re same	.20	163.00
1/17/25	BLP	B130B		Comms with M. Eng and DV re sale of president's house, timing	.30	244.50
1/17/25	DV	B130B		Attention to emails re: meeting with the Pine Hills Land Authority	.30	118.50
1/17/25	DV	B130B		Attention to email from D. Polley re: real property tax exemption renewal and reviewed forms for same	.30	118.50
1/17/25	MSE	B130B		Review of Becker APA re: closing.	.40	256.00
1/17/25	MSE	B130B		Correspondence with B. Pollack re: Becker closing date.	.10	64.00

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Date	Atty	Task	Actv	Description	Hours	Amount
1/21/25	BLP	B130B		Comms with Becker team re title, closing documents (.2); comms re information to finalize County access agreement (.2)	.40	326.00
1/21/25	BLP	B130B		Conferences with RE partner re transfer tax, title, timing of closing with Becker	.30	244.50
1/22/25	BLP	B130B		Finalize and circulate access agreement (.3); conference with M. Eng re President's house closing issues (.2)	.50	407.50
1/22/25	BLP	B130B		Discussion with M. Eng re comms with Becker counsel and closing issues to deal with	.20	163.00
1/22/25	MSE	B130B		Phone call with B. Pollack re: title report and Schedule B.	.20	128.00
1/22/25	MSE	B130B		Review of title report.	.40	256.00
1/22/25	MSE	B130B		Phone call with title company re: closing and tax escrow.	.20	128.00
1/24/25	BLP	B130B		Review license agreement for County visitors and several comms re same	.40	326.00
1/24/25	DV	B130B		Prepared access agreement for Authority	1.20	474.00
1/24/25	DV	B130B		Emails w/ B. Pollack and M. Eng re: same	.40	158.00
1/24/25	DV	B130B		Telephone call w/ M. Eng re: same (.2); email to M. White re: same (.1).	.30	118.50
1/24/25	MSE	B130B		Correspondence with D. Vespia and B. Pollack re: license agreement.	.10	64.00
1/24/25	MSE	B130B		Review of county license agreement.	.20	128.00
1/24/25	MSE	B130B		Phone call with D. Vespia re: license agreement and hold harmless agreement.	.20	128.00
1/26/25	BLP	B130B		Comms re insurance coverage by Authority under access agreement and review policy re same	.40	326.00
1/26/25	DV	B130B		Attention to emails re: real estate access agreement.	.20	79.00
1/27/25	BLP	B130B		Comms re Authority objection to title notice	.20	163.00
1/27/25	DV	B130B		Attention to license agreement for State of the County	1.20	474.00

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Date	Atty	Task	Actv	Description	Hours	Amount
1/27/25	MSE	B130B		Review of insurance certificate and license agreement.	.20	128.00
1/27/25	MSE	B130B		Correspondence with B. Pollack re: insurance certificate.	.10	64.00
1/27/25	MSE	B130B		Correspondence with County counsel re: license agreement.	.10	64.00
1/27/25	MSE	B130B		Review and draft of comments to facility use agreement.	.50	320.00
1/27/25	MSE	B130B		Phone call with buyer's real estate counsel re: extension to title objection notice.	.20	128.00
1/27/25	MSE	B130B		Review of Authority APA re: title objections.	.20	128.00
1/27/25	MSE	B130B		Correspondence with B. Pollack re: request for title objection extension.	.20	128.00
1/27/25	MSE	B130B		Correspondence w/ B. Pollack re: title objections.	.10	64.00
1/27/25	MSE	B130B		Review of revised COI for authority	.10	64.00
1/28/25	KM	B130B		Preparing language to use in support of real estate tax exemption renewal applications and related review of instruction materials.	1.00	395.00
1/28/25	MGR	B130B		Call with FTI and client regarding EC meeting and open issues including sale of personal property to County Authority as part of acquisition.	.80	696.00
1/28/25	DV	B130B		Emails w/ M. Eng re: County insurance	.30	118.50
1/28/25	DV	B130B		Email to M. White re: same	.10	39.50
1/28/25	DV	B130B		Emails w/ K. McDonough and D. Polley re: real property tax exemption renewals	.40	158.00
1/29/25	KM	B130B		Drafting language for applications to renew real estate tax exemptions on campus properties; drafting forms of General Releases to use with employees/representatives of the Albany Land Authority and to use for other third parties.	1.30	513.50
1/29/25	DV	B130B		Attention to draft release for campus visitors (.3); email to client re: same (.2).	.50	197.50



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Date	Atty	Task	Actv	Description	Hours	Amount
1/29/25	DV	B130B		Emails w/ D. Polley re: real property tax exemption renewals	.20	79.00
1/31/25	MSE	B130B		Phone call with Authority real estate counsel on title objection extension.	.20	128.00
1/31/25	MSE	B130B		Begin review of title report.	.40	256.00
<b>TASK SUB TOTAL</b>						<b>\$ 190,327.00</b>

**B140B RESOLUTION OF CREDITOR ISSUES**

Date	Atty	Task	Actv	Description	Hours	Amount
11/07/24	BLP	B140B		Several comms re Eastern Heating, critical vendor, to try to reach accommodations re same, strategy re critical vendor motion	.80	652.00
11/07/24	MGR	B140B		Review documents concerning Eastern contract and phone conf w/ B Johnson of Eastern regarding continuation of services and debtors ability to pay pre-petition debt.	.60	522.00
11/07/24	MGR	B140B		Emails with client regarding designating Eastern an essential vendor and necessary process.	.20	174.00
11/08/24	BLP	B140B		Several comms with client re Eastern invoices, critical vendor motion, terms of payment	.80	652.00
11/08/24	DV	B140B		Emails and meeting w/ M. Roseman and B. Pollack re: critical vendor.	.60	237.00
11/08/24	DV	B140B		Email to client re: critical vender issues.	.40	158.00
11/12/24	BLP	B140B		Several comms re critical vendor motion, timing, hearing dates, options re same	.50	407.50
11/12/24	BLP	B140B		Discussion with client re critical vendor strategy	.20	163.00
11/12/24	DV	B140B		Discussions re: critical vendor motion (.3); attention to emails re: same (.2)	.50	197.50
11/12/24	DV	B140B		Conference call re: critical vendor motion	.20	79.00

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Date	Atty	Task	Actv	Description	Hours	Amount
12/02/24	BLP	B140B		Discussion with MR re call with IRS re potential claim	.20	163.00
12/02/24	MGR	B140B		Phone conf w/ S Miller of IRS regarding open issues involving 3rd Qtr 2024 and 4th Qtr 2021 941 payroll taxes.	.50	435.00
12/02/24	MGR	B140B		Review POC from department of labor	.30	261.00
12/02/24	KC	B140B		Researching whether unemployment insurance contributions constitute a tax under section 507(a)(8).	1.60	656.00
12/09/24	MGR	B140B		Review reservation of rights POC's filed by PBCG	.40	348.00
12/19/24	MGR	B140B		Review and respond to emails concerning Spectrum payment and related issues	.30	261.00
12/23/24	BLP	B140B		Review research re unemployment claim	.40	326.00
12/23/24	BLP	B140B		Review BH motion re consent order re filing of claims by BHs and comms re same	.40	326.00
1/02/25	BLP	B140B		Comms with FTI re cure analysis and claim analysis	.20	163.00
1/03/25	BLP	B140B		Comms with S. Harding re contract assumptions, claims objections	.20	163.00
1/06/25	BLP	B140B		Comms with BH counsel re hearing on claim motion	.20	163.00
1/16/25	BLP	B140B		Review comms re fine owed to S. Carolina and comms re response to same	.30	244.50
1/16/25	MGR	B140B		E-mails regarding SC tax issue.	.30	261.00
1/16/25	KC	B140B		Reviewing research on interplay between automatic stay and police power.	.60	246.00
1/16/25	KC	B140B		Drafting stay letter in response to South Carolina Secretary of State Notice of Fine.	.40	164.00
1/20/25	BLP	B140B		Review and revise letter to So. Carolina re fine and review old comms re same	.40	326.00
1/21/25	BLP	B140B		Comms with DOL re backup for unemployment claim	.20	163.00
1/22/25	BLP	B140B		Comms with client re DOL response to additional information request	.20	163.00

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Date	Atty	Task	Actv	Description	Hours	Amount
1/22/25	MGR	B140B		Review back up documentation regarding Department of Labor priority claim and discuss strategy w/ B Pollack.	.60	522.00
1/26/25	BLP	B140B		Comms with So. Carolina taxing authority re 2022 Form 990 and waiver of fine	.20	163.00
<b>TASK SUB TOTAL</b>						<b>\$ 8,759.50</b>

**B150B CLAIMS OBJECTIONS/RESOLUTIONS**

Date	Atty	Task	Actv	Description	Hours	Amount
1/09/25	BLP	B150B		Comms with KC re claims analysis	.30	244.50
1/10/25	MGR	B150B		Review claims register.	.50	435.00
1/13/25	KC	B150B		Reviewing all filed and scheduled claims. Preparing spreadsheets to organize claims into categories (i.e., priority, secured, unsecured, etc.).	2.30	943.00
1/23/25	MGR	B150B		Review claims analysis	.40	348.00
1/23/25	KC	B150B		Conferring with B.Pollack re: claims chart.	.30	123.00
<b>TASK SUB TOTAL</b>						<b>\$ 2,093.50</b>

**B160B PLAN & DISCLOSURE STATEMENT**

Date	Atty	Task	Actv	Description	Hours	Amount
12/30/24	BLP	B160B		Begin work on disclosure statement	1.90	1,548.50
12/31/24	MGR	B160B		Discuss need for plan administrator and plan structure w/ B Pollack .	.40	348.00
1/02/25	BLP	B160B		Continued work on disclosure statement	2.60	2,119.00
1/08/25	BLP	B160B		Continued work on DS	1.00	815.00
1/09/25	BLP	B160B		Continued revisions to DS	.80	652.00

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Date	Atty	Task	Actv	Description	Hours	Amount
1/17/25	MGR	B160B		Review and respond to email from J Richardson re: plan questions	.50	435.00
1/17/25	MGR	B160B		Conf w/ B Pollack regarding exclusive time to file plan and timing regarding filing plan .	.40	348.00
1/17/25	DV	B160B		Emails w/ J. Richardson and B. Pollack re: plan of liquidation	.30	118.50
1/21/25	BLP	B160B		Prepare waterfall outline for plan	.70	570.50
1/21/25	BLP	B160B		Prepare outline of information needed for DS and conferences re same	.40	326.00
1/21/25	BLP	B160B		Continued work on DS	1.10	896.50
1/21/25	BLP	B160B		Call with FTI re plan, waterfall, concepts in plan	1.00	815.00
1/21/25	BLP	B160B		Meeting with MR re plan concepts and issues	.40	326.00
1/21/25	MGR	B160B		Review memo regarding waterfall distribution under plan and meeting w/ B Pollack to discuss same.	.70	609.00
1/21/25	MGR	B160B		Conf call with FTI team regarding plan and wind down issues.	1.00	870.00
1/21/25	DV	B160B		Emails w/ B. Pollack re: plan of liquidation	.30	118.50
1/23/25	BLP	B160B		Review and revise claims chart for plan and comms with client re same	.60	489.00
1/23/25	BLP	B160B		Revise and send waterfall to FTI	.40	326.00
1/23/25	MGR	B160B		Review revised claim waterfall in regarding to plan classifications and structure.	.60	522.00
1/24/25	BLP	B160B		Revise DS re waterfall	.40	326.00
1/27/25	MGR	B160B		Review waterfall model and liquidation analysis prepared by FTI	.60	522.00
1/27/25	MGR	B160B		Conf call with FTI team regarding liquidation analysis	.40	348.00
TASK SUB TOTAL						\$ 13,448.50

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**B170B LEASES & EXECUTORY CONTRACTS**

Date	Atty	Task	Actv	Description	Hours	Amount
1/02/25	MGR	B170B		E-mails and conf w/ B Pollack regarding parking lot leases	.50	435.00
<b>TASK SUB TOTAL</b>						<b>\$ 435.00</b>

**B180B RETENTION/PROFESSIONAL COMPENSATION/FEE**

Date	Atty	Task	Actv	Description	Hours	Amount
10/15/24	MGR	B180B		Conf with US trustee regarding retention issues.	.50	435.00
10/16/24	BLP	B180B		Prepare and file application for NDNY admission	.50	407.50
10/28/24	BLP	B180B		Comms re BH questions on retention motions	.20	163.00
11/01/24	BLP	B180B		Prepare and upload retention orders	.40	326.00
11/04/24	BLP	B180B		Comms with JLL re status of retention order	.10	81.50
11/04/24	BLP	B180B		Comms with court and UST re retention orders (.2);revise and upload new orders (.3)	.50	407.50
11/08/24	BLP	B180B		Comms with DV re monthly invoices, order re same	.20	163.00
11/17/24	BLP	B180B		Revisions to October time records to properly categorize time, conform to UST requirements	1.00	815.00
11/18/24	BLP	B180B		Continued review of time entries to comply with UST guidelines	1.20	978.00
11/19/24	BLP	B180B		Continued work on CD fee statement	1.20	978.00
11/19/24	BLP	B180B		Prepare notices of all professional's fee statements	.40	326.00
11/20/24	BLP	B180B		Review FTI, Heller fee statements	.40	326.00
11/20/24	BLP	B180B		File and circulate all fee statements	.50	407.50
11/26/24	BLP	B180B		Prepare chart for professional fee statements, payments	.30	244.50
12/06/24	BLP	B180B		Comms re payment of October monthly fees for professionals and calculation of same	.30	244.50

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Date	Atty	Task	Actv	Description	Hours	Amount
12/06/24	BLP	B180B		Begin review of November time for categories and revise accordingly	1.10	896.50
12/09/24	BLP	B180B		Work on time entries/categories for November time	.90	733.50
12/10/24	BLP	B180B		Review bill for proper time categories and adherence to guidelines	.60	489.00
12/16/24	BLP	B180B		Prepare and file notices of OCP declarations and questionnaires	.60	489.00
12/17/24	BLP	B180B		Prepare and file 3 monthly fee statements and circulate same	.60	489.00
12/23/24	BLP	B180B		Revisions to monthly fee chart for November fee statements	.30	244.50
1/02/25	BLP	B180B		Revise fee chart for allowed November payments and comms to client re same	.40	326.00
1/07/25	BLP	B180B		Review and properly categorize December time entries	1.20	978.00
1/07/25	BLP	B180B		Revise monthly fee chart for payments made to all professionals	.20	163.00
1/08/25	BLP	B180B		Continued work on December time	.80	652.00
1/10/25	BLP	B180B		Comms with FTI re monthly statement and interim fee apps	.20	163.00
1/16/25	BLP	B180B		Prepare and file all monthly fee statements	.60	489.00
<b>TASK SUB TOTAL</b>						<b>\$ 12,415.50</b>

**B185B PREPARATION FOR/ATTEND COURT HEARING**

Date	Atty	Task	Actv	Description	Hours	Amount
10/11/24	BLP	B185B		Begin preparation for first day hearings	2.70	2,200.50
10/11/24	DV	B185B		Attended meeting to prepare for First Day hearings.	1.00	395.00
10/14/24	BLP	B185B		Continued preparation for first day hearing arguments	3.20	2,608.00
10/14/24	BLP	B185B		Meeting with client re hearing preparation	2.30	1,874.50

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Date	Atty	Task	Actv	Description	Hours	Amount
10/14/24	MGR	B185B		Meeting with clients in preparation for first day hearings	2.00	1,740.00
10/14/24	MGR	B185B		Prepare presentation for 1st day hearings	1.00	870.00
10/15/24	BLP	B185B		Prepare for and attend first day hearings	2.70	2,200.50
10/15/24	MGR	B185B		Attend first day hearings.	1.20	1,044.00
10/15/24	MGR	B185B		Review presentation and prepare for 1st day hearings.	.50	435.00
10/15/24	DV	B185B		Attention to first-day hearings	1.00	395.00
10/15/24	DV	B185B		Telephone call w/ M. Roseman and B. Pollack re: same	.30	118.50
10/15/24	DV	B185B		Meeting w/ client to discuss same	.50	197.50
10/29/24	BLP	B185B		Comms re hearing agendas (.3) discussion with client re same and hearing prep (.2)	.50	407.50
10/29/24	MGR	B185B		Review motions and objection status for hearing on 11/5.	.40	348.00
11/01/24	BLP	B185B		Begin prep for second day hearings(.3); revise andfile hearing agenda (.2)	.50	407.50
11/03/24	BLP	B185B		Continued hearing preparation	1.30	1,059.50
11/04/24	BLP	B185B		Call with client re preparation for second day hearings	.50	407.50
11/04/24	MGR	B185B		Conf call with client to prepare for hearing	.50	435.00
11/04/24	MGR	B185B		Prepare for hearings and update to court.	1.00	870.00
11/04/24	DV	B185B		Attended meeting re: hearing prep.	.80	316.00
11/05/24	BLP	B185B		Prepare for and attend hearings	2.90	2,363.50
11/05/24	MGR	B185B		Attend hearings.	1.00	870.00
11/11/24	BLP	B185B		Extensive hearing prep for sale motion and 5 other motions	3.70	3,015.50
11/12/24	BLP	B185B		Continued hearing prep for 6 hearings	2.90	2,363.50
11/12/24	DV	B185B		Attention to hearing prep (.3); emails and telephone call w/ B. Pollack re: same (.2)	.50	197.50
11/13/24	BLP	B185B		Prepare for and attend multiple hearings in case	3.90	3,178.50

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Date	Atty	Task	Actv	Description	Hours	Amount
11/13/24	MGR	B185B		Attend court hearing via telephone including confs w/ B Pollack regarding strategy during court break.	2.00	1,740.00
12/18/24	BLP	B185B		Extensive preparation for sale hearing	2.60	2,119.00
12/18/24	MGR	B185B		Prepare for hearing to approve sales.	.70	609.00
12/19/24	BLP	B185B		Continued sale hearing preparation	1.30	1,059.50
12/19/24	BLP	B185B		Attend sale hearing	1.30	1,059.50
12/19/24	MGR	B185B		Attend hearing to approve sales of real property	1.00	870.00
12/19/24	DV	B185B		Attended hearing on real estate sales by phone.	.50	197.50
1/13/25	BLP	B185B		Prepare for Pension hearing	.90	733.50
1/13/25	BLP	B185B		Prepare for cy pres/stay hearing	1.00	815.00
1/14/25	MGR	B185B		E-mails w/ B Pollack regarding motion strategy.	.30	261.00
1/15/25	BLP	B185B		Prepare for and attend pension, cy pres hearings	1.50	1,222.50
1/15/25	DV	B185B		Attended hearing by phone.	.40	158.00

**TASK SUB TOTAL**

**\$ 41,162.50**

**B195B NON-WORKING TRAVEL**

Date	Atty	Task	Actv	Description	Hours	Amount
10/14/24	BLP	B195B		Travel to Albany for first day hearings	3.00	N/C
10/14/24	MGR	B195B		Travel to Albany	3.50	N/C
10/15/24	BLP	B195B		Travel to NYC from Albany for hearings	4.20	N/C
10/15/24	MGR	B195B		Travel from Albany	4.00	N/C
11/04/24	BLP	B195B		Travel to Albany for hearings	3.00	N/C
11/04/24	MGR	B195B		Travel to Albany	4.50	N/C
11/05/24	BLP	B195B		Travel from Albany for hearings	4.50	N/C
11/05/24	MGR	B195B		Travel from Albany	4.50	N/C
11/12/24	BLP	B195B		Non-working travel to Albany for hearings	2.10	N/C



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Date	Atty	Task	Actv	Description	Hours	Amount
11/13/24	BLP	B195B		Non-working travel	4.00	N/C
11/21/24	BLP	B195B		Non-working travel to Albany	4.00	N/C
11/21/24	DV	B195B		Traveled to/from the College for 341 meeting.	7.50	N/C
11/22/24	BLP	B195B		Non-working travel from Albany	4.00	N/C
12/11/24	BLP	B195B		Travel to Albany for auction	4.00	N/C
12/11/24	MGR	B195B		Travel to Albany for auction of campus.	4.00	N/C
12/11/24	DV	B195B		Travel to Albany for walkthrough and auction.	3.00	N/C
12/13/24	BLP	B195B		Travel from Albany	4.00	N/C
12/13/24	MGR	B195B		Travel from Albany to NY after auction.	3.50	N/C
12/13/24	DV	B195B		Return travel from Albany.	3.00	N/C
12/18/24	BLP	B195B		Travel to Albany for sale hearing	4.00	N/C
12/19/24	MGR	B195B		Travel to Albany for hearing to approve sale of real estate.	3.50	N/C
12/20/24	BLP	B195B		Travel back from Albany	4.00	N/C
12/20/24	MGR	B195B		Travel from Albany	4.00	N/C
1/14/25	BLP	B195B		Travel to Albany for hearings	4.00	N/C
1/15/25	BLP	B195B		Travel to NY back from hearings	4.00	N/C

**B210B MOTION PRACTICE**

Date	Atty	Task	Actv	Description	Hours	Amount
10/10/24	KC	B210B		Drafting form notice of motion to be used in matter.	.50	205.00
10/16/24	BLP	B210B		Finalize and file orders re all first day motions	.90	733.50
10/17/24	KC	B210B		Reviewing interim and other orders entered yesterday for service requirements.	.30	123.00
10/18/24	BLP	B210B		Revisions to OCP motion and comms with client re same	.60	489.00
10/18/24	BLP	B210B		Revise, finalize and file de minimus sale motion	1.20	978.00

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Date	Atty	Task	Actv	Description	Hours	Amount
10/18/24	BLP	B210B		Draft artwork sale motion and comms with client re same	1.60	1,304.00
10/21/24	BLP	B210B		Finalize artwork sale motion	.40	326.00
10/21/24	BLP	B210B		Prepare motion to sell pianos	1.50	1,222.50
10/21/24	MGR	B210B		Review and discuss comments w/ B Pollack regarding motion to enter into agreement to sell pianos.	.60	522.00
10/22/24	BLP	B210B		Prepare notices of hearings for 3 motions	.40	326.00
10/22/24	BLP	B210B		Finalize OCP motion	.30	244.50
10/22/24	BLP	B210B		File all motions	.40	326.00
10/22/24	BLP	B210B		Comms with court re same	.20	163.00
10/23/24	BLP	B210B		File amended Artwork exhibit	.20	163.00
10/23/24	MGR	B210B		Review motions to approve consignment agreement	.50	435.00
10/24/24	BLP	B210B		Prepare notice of withdrawal of pro hac vice motions	.20	163.00
11/01/24	BLP	B210B		Lengthy call with BHs re art and piano motions, revisions requested to orders	.50	407.50
11/01/24	BLP	B210B		Lengthy discussion with client re art and pianos, value, sales process, changes requested by BHs	.70	570.50
11/03/24	BLP	B210B		Revise cash management order re P Card and comms with M&T re same	.40	326.00
11/04/24	BLP	B210B		Comms re P Card account, security account and language in cash management order re same	.40	326.00
11/04/24	BLP	B210B		Prepare final utility and insurance orders and comms re same	.40	326.00
11/04/24	BLP	B210B		Review M&T changes to cash management order and comms re same	.30	244.50
11/05/24	BLP	B210B		Finalize and file all final orders	.70	570.50
11/06/24	BLP	B210B		Revise sale, art, piano and monthly compensation orders per lender and BH requests	.80	652.00
11/11/24	BLP	B210B		Prepare critical vendor motion	1.60	1,304.00

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Date	Atty	Task	Activ	Description	Hours	Amount
11/11/24	DV	B210B		Reviewed critical vendor motion (.2); attention to emails re: same (.2).	.30	118.50
11/13/24	BLP	B210B		Conference re motion to shorten notice re critical vendor	.20	163.00
11/13/24	BLP	B210B		Prepare and file 5 orders from hearing (other than sale order) as well as critical vendor order	1.90	1,548.50
11/13/24	KC	B210B		Confer with B.Pollack and subsequently draft motion to shorten notice for critical vendor motion.	1.50	615.00
11/13/24	KC	B210B		Revising proposed order for authorization to pay pre-petition claims of critical vendors in light of judge's ruling on oral motion re: the same. Send to B.Pollack for review.	.50	205.00
11/14/24	BLP	B210B		Finalize and upload critical vendor order	.30	244.50
11/14/24	MGR	B210B		Review form of order authorizing bid procedures.	.50	435.00
11/18/24	BLP	B210B		Work on motion to make payments from pension plan	2.30	1,874.50
12/01/24	DV	B210B		Reviewed motion to distribute from pension plan (.3); emails w/ B. Pollack re: same (.2); emails w/ B. Pollack re: motion re: cy pres (.3).	.80	316.00
12/11/24	BLP	B210B		Prepare notices of stay and pension motion and file motions	.70	570.50
12/11/24	BLP	B210B		Review and revise AOS for motions and comms re same	.30	244.50
1/14/25	BLP	B210B		Revise pension order and file same/blacklined re KeyBank changes	.40	326.00
1/16/25	BLP	B210B		Finalize and upload orders re 1.15 hearings	.40	326.00
1/17/25	BLP	B210B		Prepare motion to extend exclusivity and comms with client re same	1.60	1,304.00
1/17/25	DV	B210B		Reviewed draft motion for extension of time to file plan and emails re: same	.40	158.00
1/21/25	BLP	B210B		Comms with client re exclusivity motion and timing of filing same	.30	244.50

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Date	Atty	Task	Actv	Description	Hours	Amount
1/21/25	BLP	B210B		Review and revise motion to shorten notice re exclusivity	.60	489.00
1/21/25	KC	B210B		Drafting motion for order shortening notice period.	1.10	451.00
1/22/25	BLP	B210B		Finalize, file and comm with chambers re motion to shorten notice and motion to extend exclusivity	.40	326.00
1/22/25	BLP	B210B		Review signed order re exclusivity motion and conference re service of same	.30	244.50
1/22/25	BLP	B210B		Comms with client re exclusivity motion, order, hearing date	.20	163.00
TASK SUB TOTAL						\$ 22,817.50

#### B220B OPERATING REPORTS

Date	Atty	Task	Actv	Description	Hours	Amount
11/18/24	BLP	B220B		Further call with client re MOR and review of same	.30	244.50
11/19/24	BLP	B220B		Comms re questions on MORs	.30	244.50
11/20/24	BLP	B220B		Review MOR and comms re same	.80	652.00
11/21/24	BLP	B220B		Review and input MOR to upload, file and circulate same	1.20	978.00
12/19/24	BLP	B220B		Review and populate/file MOR and comms with lenders/UST re same	.80	652.00
1/17/25	BLP	B220B		Review, populate and file MOR	.80	652.00
TASK SUB TOTAL						\$ 3,423.00

#### B230A GOVERNANCE ISSUES

Date	Atty	Task	Actv	Description	Hours	Amount
10/10/24	BLP	B230A		Attend board meeting regarding filing and bankruptcy matters	1.20	978.00

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Date	Atty	Task	Actv	Description	Hours	Amount
10/10/24	MGR	B230A		Prepare for and participate in board of trustees meeting to approve chapter 11 filing.	2.50	2,175.00
10/10/24	DV	B230A		Attended special meeting of the Board of Trustees	2.20	869.00
10/10/24	DMM	B230A		Drafting email to J. Whittaker re: Alumni Association	.40	158.00
10/10/24	DMM	B230A		Mtg w/ D. Vespia re: Alumni association	.40	158.00
10/16/24	MGR	B230A		Review hearing notes, executive committee agenda and prepare for executive committee call.	.70	609.00
10/16/24	DV	B230A		Attention to materials for Board meeting	1.20	474.00
10/16/24	DV	B230A		Emails to L. Thomson re: same	.20	79.00
10/16/24	DV	B230A		Reviewed draft agenda	.10	39.50
10/16/24	DV	B230A		Emails w/ J. Stone re: employment matters and board discussion re: same	.40	158.00
10/16/24	DMM	B230A		Call w/ J. Whittaker re: dissolution of Alumni Association	.50	197.50
10/17/24	MGR	B230A		Participate in executive Committee call providing bankruptcy update and discussions regarding officer retention.	1.50	1,305.00
10/17/24	DV	B230A		Attended Executive Committee meeting.	1.80	711.00
10/18/24	MGR	B230A		E-mails w/ M White and J Stone regarding scheduling a special EC board meeting.	.40	348.00
10/22/24	DV	B230A		Attended Executive Committee meeting.	1.00	395.00
10/22/24	DMM	B230A		Mtg w/ M. Gardner, L. Thomson re: Alumni Assoc. status.	.40	158.00
10/23/24	MGR	B230A		Phone conf w/ F Brennan regarding EC meeting and potential issues regarding board and case status.	.30	261.00
10/23/24	DV	B230A		Reviewed and revised draft minutes(.3); emails w/ L Thomson re: same (.2)	.50	197.50
10/24/24	BLP	B230A		Attend Executive Committee meeting to discuss bankruptcy issues	.90	733.50
10/24/24	MGR	B230A		Prepare for and participate in executive committee call	1.00	870.00

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Date	Atty	Task	Activ	Description	Hours	Amount
10/24/24	DV	B230A		Attended Executive Committee meeting.	1.00	395.00
10/24/24	DV	B230A		Email re: EMMA postings.	.20	79.00
10/25/24	DV	B230A		Telephone call w/ D. Mitacek re: Alumni Association.	.20	79.00
10/25/24	DMM	B230A		Email to J. Whittaker, V. VanDunk and L. Thomson re: scheduling mtg re: Alumni Assoc.	.20	79.00
10/28/24	DV	B230A		Emails w/ L. Thomson re: upcoming board meetings	.20	79.00
10/28/24	DV	B230A		Meeting w/ M. White, J. Stone, and L. Thomson re: committees and upcoming meetings	.50	197.50
10/28/24	DMM	B230A		Email to/from L. Thomson and J. Whittaker re: Alumni Association.	.20	79.00
10/29/24	DV	B230A		Meeting to discuss next steps for alumni association	.60	237.00
10/29/24	DV	B230A		Meeting w/ D. Mitacek re: Association	.20	79.00
10/29/24	DMM	B230A		Zoom mtgs with M. White, L. Thomson et. al. re: Alumni Association re: impact of Bankruptcy.	1.20	474.00
10/30/24	DV	B230A		Meeting to discuss alumni association dissolution.	.60	237.00
10/31/24	BLP	B230A		Participate in EC meeting and provide report	.90	733.50
10/31/24	MGR	B230A		Prepare and participate in weekly executive committee call.	1.00	870.00
11/04/24	DV	B230A		Attention to agenda for TAG committee meeting (.2); emails w/ L. Thomson re: same (.2).	.40	158.00
11/04/24	DMM	B230A		Reviewing and commenting on Board resolution.	.30	118.50
11/06/24	DV	B230A		Prepared materials for Executive Committee meeting.	.50	197.50
11/06/24	DV	B230A		Emails w/ L. Thomson re: same.	.20	79.00
11/06/24	DV	B230A		Attended TAG Committee meeting.	.40	158.00
11/07/24	BLP	B230A		Call with Board re bankruptcy matters including response to objection of Authority	1.30	1,059.50
11/07/24	MGR	B230A		Prepare for and participate in executive committee meeting and report on status of bankruptcy case and sales process.	1.50	1,305.00

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Date	Atty	Task	Actv	Description	Hours	Amount
11/07/24	DV	B230A		Attended Executive Committee meeting.	1.50	592.50
11/10/24	DV	B230A		Email w/ L. Thomson re: materials for Board meeting (.1); emails w/ M. Roseman re: Board meeting (.2).	.30	118.50
11/11/24	BLP	B230A		Comms re list of bidders requested for conflict check by Board member for outside interest and response to same	.30	244.50
11/11/24	DV	B230A		Attended prep meeting and Executive Committee meeting	2.00	790.00
11/11/24	DV	B230A		Attention to meeting minutes	.30	118.50
11/11/24	DV	B230A		Emails w/ L. Thomson re: same	.20	79.00
11/11/24	DV	B230A		Emails re: trustee of Counsel role and request for bidder names.	.20	79.00
11/13/24	DV	B230A		Attention to materials for Executive Committee meeting.	.30	118.50
11/13/24	DV	B230A		Email to L. Thomson re: same.	.10	39.50
11/13/24	DV	B230A		Revised meeting materials.	.40	158.00
11/13/24	DV	B230A		Emails w/ L. Thomson re: same.	.10	39.50
11/14/24	BLP	B230A		Participate in Executive Committee meeting for discussion of all bankruptcy matters	1.00	815.00
11/14/24	MGR	B230A		Attend and participate in EC meeting to discuss bankruptcy status and sales process.	1.00	870.00
11/14/24	DV	B230A		Attended Executive Committee meeting	1.00	395.00
11/14/24	DV	B230A		Meeting w/ M. White, J. Stone, and M. O'Hanlon to discuss Trustee of Counsel role.	.40	158.00
11/14/24	DV	B230A		Attention to NDA in connection w/ same.	.20	79.00
11/19/24	DV	B230A		Prepared NDA for trustee (.3); email to M. O'Hanlon re: same (.1).	.40	158.00
11/19/24	DV	B230A		Reviewed materials for Board meeting.	.60	237.00
11/19/24	DV	B230A		Email to L. Thomson re: same.	.20	79.00
11/20/24	MGR	B230A		Review board agenda and prepare presentation.	.80	696.00

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Date	Atty	Task	Actv	Description	Hours	Amount
11/21/24	BLP	B230A		Participate in Board meeting re numerous operational and bankruptcy issues	1.30	1,059.50
11/21/24	MGR	B230A		Attend and present status of bankruptcy and sales process at full board of trustees meeting	1.50	1,305.00
11/21/24	DV	B230A		Prepared for and attended meeting of the Board of Trustees.	2.30	908.50
11/22/24	DV	B230A		Telephone call w/ M. Roseman re: meeting w/ Authority (.2); emails to Executive Committee re: same (.3).	.50	197.50
12/02/24	DV	B230A		Attended Executive Committee meeting.	1.00	395.00
12/05/24	BLP	B230A		Participate in Executive Committee call re bankruptcy issues	1.30	1,059.50
12/05/24	MGR	B230A		Participate in meeting of Executive Committee and present on auction process, bankruptcy status and PHLA update.	1.50	1,305.00
12/05/24	MGR	B230A		Prepare for presentation to executive committee.	.50	435.00
12/06/24	MGR	B230A		Participate in conf call with Executive Committee regarding auction process and strategy.	1.00	870.00
12/06/24	DV	B230A		Attended Executive Committee meeting	1.00	395.00
12/06/24	DV	B230A		Attention to materials for special Board meeting	.40	158.00
12/06/24	DV	B230A		Emails w/ L. Thomson re: board meeting.	.20	79.00
12/08/24	BLP	B230A		Attend board meeting to discuss bids received, auction process and possible outcomes	1.40	1,141.00
12/08/24	MGR	B230A		Prepare for and participate in Board of Trustee conf call to review bankruptcy status and auction procedures.	1.50	1,305.00
12/08/24	DV	B230A		Attended special meeting of the Board.	1.50	592.50
12/09/24	BLP	B230A		Discussion with DV re board resolution for sale	.30	244.50
12/09/24	MGR	B230A		Conf call with FTI, College and select board members regarding case status and issues related to the Auction process.	1.00	870.00
12/09/24	DV	B230A		Attention to resolution re: property sales.	.40	158.00



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Date	Atty	Task	Actv	Description	Hours	Amount
12/10/24	MGR	B230A		Conf call with working team from FTI, select board members regarding status, auction and related issues.	1.00	870.00
12/10/24	DV	B230A		Attention to materials for Board meeting.	.60	237.00
12/12/24	DV	B230A		Prepared resolution re: successful bids for Board meeting (.4); emails w/ L. Thomson re: same (.2).	.60	237.00
12/13/24	BLP	B230A		Attend board meeting re auction and results of sale	1.20	978.00
12/13/24	MGR	B230A		Prepare for and participate in board of trustee meeting to outline auction results and next steps in chapter 11 case.	1.50	1,305.00
12/13/24	DV	B230A		Attended special board meeting.	1.30	513.50
12/13/24	DV	B230A		Emails w/ L. Thomson re: board resolution.	.20	79.00
12/14/24	MGR	B230A		Review proposed notes on the draft audited financial statement	1.00	870.00
12/16/24	BLP	B230A		Call with audit committee of college re audited financial and notes re same	.60	489.00
12/16/24	DV	B230A		Reviewed draft audited financials in preparation for Audit Committee meeting.	.60	237.00
12/16/24	DV	B230A		Meeting w/ B. Pollack to discuss same.	.30	118.50
12/16/24	DV	B230A		Conference call w/ B. Pollack and D. Polley re: same.	.20	79.00
12/16/24	DV	B230A		Attended Audit Committee meeting.	.60	237.00
12/18/24	DV	B230A		Attention to materials for Board meeting; emails w/ M. McLane re: same.	.70	276.50
12/19/24	BLP	B230A		Attend board meeting to discuss sale hearing and go forward issues with Authority	.80	652.00
12/19/24	MGR	B230A		Prepare for and attend board of trustee meeting.	1.00	870.00
12/19/24	DV	B230A		Attended special meeting of the Board.	1.30	513.50
1/14/25	DV	B230A		Attention to materials for Executive Committee meeting.	.40	158.00
1/15/25	MGR	B230A		Review agenda and prepare for executive committee meeting.	.50	435.00

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Date	Atty	Task	Activ	Description	Hours	Amount
1/16/25	BLP	B230A		Attend Executive Board meeting to report on bankruptcy process and hearings	1.30	1,059.50
1/16/25	DV	B230A		Attended Executive Committee meeting.	1.40	553.00
1/16/25	RG	B230A		Attend to issues re: board minutes and governance	1.50	592.50
1/17/25	RG	B230A		Attend to issues re: board minutes and governance	1.10	434.50
1/21/25	RG	B230A		Attend to issues re: board minutes and governance	1.70	671.50
1/23/25	RG	B230A		Attend to issues re: board minutes and governance	.40	158.00
1/28/25	MGR	B230A		Review Cy pres and PBGC motion and opposition in preparation for report to EC	1.30	1,131.00
1/29/25	MGR	B230A		Listen to hearing on Cy Pres and Pension and prepare notes for Executive committee meeting.	1.00	870.00
1/29/25	DV	B230A		Prepared materials for Executive Committee meeting	.40	158.00
1/30/25	MGR	B230A		Attend and participate in executive committee meeting.	1.30	1,131.00
1/30/25	MGR	B230A		Review notes and prepare for EC meeting.	.50	435.00
1/30/25	DV	B230A		Attended Executive Committee meeting.	1.20	474.00
1/30/25	RG	B230A		Attend to issues re: board minutes and governance	1.50	592.50
1/31/25	DV	B230A		Emails w/ J. Richardson re: materials for Board meeting.	.20	79.00
1/31/25	RG	B230A		Attend to issues re: board minutes and governance	2.20	869.00
<b>TASK SUB TOTAL</b>						<b>\$ 54,273.50</b>

**B240B EDUCATION/REGULATORY MATTERS**

Date	Atty	Task	Activ	Description	Hours	Amount
10/11/24	DV	B240B		Prepared response to D. Polley re: CSD	1.20	474.00
10/11/24	DV	B240B		Email to NYSED Deputy Counsel re: charter	.30	118.50

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Date	Atty	Task	Activ	Description	Hours	Amount
10/11/24	DMM	B240B		Reviewing and commenting on response re: closed school discharge.	.30	118.50
10/12/24	DV	B240B		Email to D. Polley re: CSD.	.60	237.00
10/15/24	DV	B240B		Emails w/ M. White re: notice for USDOE	.20	79.00
10/15/24	DV	B240B		Email to NYSED Deputy Counsel re: bankruptcy plan	.30	118.50
11/25/24	DV	B240B		Email to NYSED re: charter.	.10	39.50
11/26/24	DV	B240B		Emails w/ D. Polley re: outreach to USDOE (.2); attention to emails re: MSCHE follow-up (.2).	.40	158.00
12/01/24	DV	B240B		Emails w/ M. McLane re: MSCHE action.	.20	79.00
12/17/24	DV	B240B		Emails w/ D. Polley and R. Soebke re: response to subpoena for student records (.3); emails w/ D. Parise re: preparation of response to same (.1).	.40	158.00
12/17/24	DP	B240B		Draft response to subpoena duces tecum.	.60	237.00
12/18/24	DV	B240B		Discussion w/ D. Parise re: draft response to subpoena for student records (.1); reviewed draft response (.2).	.30	118.50
12/18/24	DP	B240B		Finalize response to subpoena duces tecum.	.60	237.00
12/20/24	DV	B240B		Emails w/ D. Polley re: audit submission.	.20	79.00
12/20/24	DV	B240B		Email to D. Polley re: response to subpoena.	.20	79.00
1/06/25	BLP	B240B		Review annual report needed for compliance with CRC employment	.30	244.50
1/06/25	DV	B240B		Reviewed Perkins close-out letter.	.10	39.50
1/09/25	DV	B240B		Emails w/ J. Knapp re: request for student records.	.20	79.00
1/21/25	DV	B240B		Emails w/ M. McLane re: NYSED communications.	.30	118.50
1/21/25	RS	B240B		Reviewed HIPAA release from former student	.20	79.00
1/21/25	RS	B240B		Reviewed regulations re intersection of FERPA and HIPAA.	.30	118.50
1/21/25	RS	B240B		Sent response to former student's attorney.	.30	118.50
1/22/25	DV	B240B		Telephone call w/ D. Parise re: USDOE claim inquiry.	.60	237.00
1/22/25	DP	B240B		Begin researching closed school discharge procedures	2.90	1,145.50

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Date	Atty	Task	Actv	Description	Hours	Amount
1/23/25	DV	B240B		Emails w/ R. Soebke re: student record request (.2); discussion w/ J. Knapp re: same (.1); reviewed email from J. Richardson re: same (.1).	.40	158.00
1/31/25	DV	B240B		Emails w/ J. Richardson re: request for student records	.10	39.50
1/31/25	DP	B240B		Continue researching liability for closed school discharge.	4.10	1,619.50
<b>TASK SUB TOTAL</b>						<b>\$ 6,327.50</b>

**B250B ENDOWMENT/ATTORNEY GENERAL MATTERS**

Date	Atty	Task	Actv	Description	Hours	Amount
10/11/24	DV	B250B		Attention to draft media response re: restricted endowment.	.20	79.00
10/16/24	DV	B250B		Emails w/ A. Nitkewicz re: CGA transfer matter emails w/ D. Polley re: CGA agreements	.50	197.50
10/17/24	DV	B250B		Telephone call w/ D. Mitacek re: status of cy pres petition and next steps.	.40	158.00
10/18/24	DV	B250B		Emails re: endowment matters.	.20	79.00
10/18/24	DMM	B250B		Reviewing and finalizing draft chart of endowment funds and Email to D. Polley re: same.	.60	237.00
10/21/24	DMM	B250B		Participating in a meeting re: cy pres petition process and status of petition.	.40	158.00
10/22/24	BLP	B250B		Conference re stay issues regarding cy pres and strategy re same	.40	326.00
10/22/24	DV	B250B		Reviewed correspondence re: endowment fund	.30	118.50
10/22/24	DV	B250B		Emails w/ D. Mitacek re: same	.20	79.00
10/22/24	DV	B250B		Attended meeting w/ College leadership to discuss cy pres petition	1.00	395.00
10/22/24	DMM	B250B		Reviewing email re: Connors scholarship fund and mtg w/ D. Vespia, M. Gardner, L. Thomson re: same.	.30	118.50

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Date	Atty	Task	Actv	Description	Hours	Amount
10/23/24	DV	B250B		Emails w/ D. Mitacek re: notice information for cy pres petition.	.20	79.00
10/23/24	DMM	B250B		Mtg w/ D. Parise re: creating chart of donors for notice to cy pres petition. Email to D. Vespia to discuss potential alternatives to notice by mail.	.30	118.50
10/24/24	DV	B250B		Telephone call w/ D. Mitacek re: cy pres petition email to AAG re: meeting to discuss same.	.50	197.50
10/24/24	DMM	B250B		Email to/from D. Parise and mtg w/ D. Vespia re: addresses for notice of petition.	.30	118.50
10/27/24	DMM	B250B		Email to B. Pollack w/ legal basis for need to file cy pres petition.	.70	276.50
10/28/24	BLP	B250B		Conferences re cy pres notice issues, motion strategy	.50	407.50
10/28/24	DV	B250B		Meeting w/ B. Pollack to discuss cy pres petition	.30	118.50
10/28/24	DV	B250B		Meeting w/ D. Mitacek and B. Pollack re: same	.20	79.00
10/28/24	DV	B250B		Emails w/ AAG re: meeting to discuss same cy pres	.20	79.00
10/29/24	BLP	B250B		Conference re research on cy pres	.30	244.50
10/29/24	BLP	B250B		Conference with DV re cy pres process and costs	.40	326.00
10/29/24	DV	B250B		Prepared for and attended meeting w/ NYAG re: cy pres petition	.80	316.00
10/29/24	DV	B250B		Discussion w/ client re: cy pres	.30	118.50
10/29/24	DMM	B250B		Zoom mtg w/ Asst. AG re: cy pres filing and notice to donors and review of chart of funds and donors in prep. for mtg.	.80	316.00
10/29/24	KC	B250B		Confer with B.Pollack re: endowment/cypres/abandonment research-specific issues.	.20	82.00
10/30/24	BLP	B250B		Review comms re cy pres funds and abandonment issues	.40	326.00
10/30/24	KC	B250B		Continue researching issue of abandonment of endowment funds to state attorney general and related issues.	1.10	451.00

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Date	Atty	Task	Actv	Description	Hours	Amount
10/30/24	KC	B250B		Research re: endowment funds, abandonment and related issues.	2.00	820.00
10/31/24	BLP	B250B		Discussion re Heuther estate court appearance, issues re endowment in bankruptcy	.30	244.50
10/31/24	AN	B250B		Call with DV, BP and CB regarding Huether argument.	.50	197.50
10/31/24	AN	B250B		Draft cy pres information for CB for Huether hearing.	.50	197.50
10/31/24	DV	B250B		Meeting to discuss Huether oral argument.	.40	158.00
10/31/24	DMM	B250B		Attention to talking points for Huether motion.	.40	158.00
10/31/24	CEB	B250B		Call with A. Nitkewicz, B. Pollack and D. Vespia regarding 11/1/24 hearing in Schenectady County Surrogates Court in the Huether estate matter and prepare for hearing	1.20	474.00
11/01/24	BLP	B250B		Comms re bankruptcy issues affecting Huether estate and oral argument talking points	.30	244.50
11/01/24	AN	B250B		Calls with Chris Buckey, Dina Vespia, Debbie Polley regarding potential settlement at Huether court appearance and draft email to Debbie Polley regarding court outcome.	2.10	829.50
11/01/24	DV	B250B		Attention to emails re: Huether estate.	.30	118.50
11/01/24	CEB	B250B		Prepare for summary judgment hearing	3.80	1,501.00
11/01/24	CEB	B250B		Attend summary judgment hearing in Schenectady Surrogates Court; negotiate and place settlement on record; email summary to C&D team	3.80	1,501.00
11/13/24	DMM	B250B		Preliminary review of endowment chart indicating dollar amounts for funds with multiple donors (0.3). Reviewing of email re: dispute re: Conners endowment (0.2).	.50	197.50
11/18/24	DV	B250B		Emails w/ L. Thomson re: response to donor (.2); attention to emails re: KeyBank accounts (.2).	.40	158.00
11/26/24	BLP	B250B		Discussion with client re CGA account issues and follow up discussion with KeyBank Trust re same	.40	326.00

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Date	Atty	Task	Activ	Description	Hours	Amount
11/26/24	DV	B250B		Conference call w/ B. Pollack and D. Polley re: CGA account (.3); telephone call w/ KeyBank re: same (.2).	.50	197.50
11/26/24	DV	B250B		Attention to endowment spreadsheet (.2); reviewed emails in connection w/ same (.2).	.40	158.00
11/27/24	BLP	B250B		Work on motion to vacate stay re cy pres and comms re same	2.40	1,956.00
12/01/24	DV	B250B		Emails w/ D. Mitacek re: cy pres petition.	.30	118.50
12/02/24	BLP	B250B		Comms re CGA Agreements and terms	.40	326.00
12/03/24	BLP	B250B		Discussion with DV re cy pres issues, motion to vacate stay re same	.20	163.00
12/03/24	DV	B250B		Emails and telephone call w/ B. Pollack re: CGAs.	.30	118.50
12/04/24	BLP	B250B		Revise motion to vacate stay re cy pres	.40	326.00
12/05/24	DMM	B250B		Reviewing and commenting on motion to vacate stay to allow cy pres proceeding for endowment.	.80	316.00
12/06/24	BLP	B250B		Review and discuss DM changes to cy pres stay motion	.30	244.50
12/10/24	BLP	B250B		Revisions to stay motion for cy pres	.30	244.50
12/11/24	BLP	B250B		Review client comments to stay motion for cy pres and revise motion accordingly	.50	407.50
12/11/24	BLP	B250B		Discussion with DIP counsel re cy pres questions	.20	163.00
12/21/24	BLP	B250B		Review email form BHs re request for information re cy pres and internal comms re same	.30	244.50
12/21/24	DV	B250B		Emails re: restricted endowment.	.20	79.00
12/23/24	BLP	B250B		Conferences re BH questions on cy pres and how to respond due to confidentiality issues	.90	733.50
12/23/24	BLP	B250B		Draft email to BHs with spreadsheet re cy pres and discussion of CGA issues in response to inquiries and circulate for internal review	.30	244.50
12/23/24	MGR	B250B		Review draft Cy Pres motion and discuss bondholder inquiries to establish facts that funds are subject to valid restrictions and not available to pay creditor claims.	.80	696.00

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Date	Atty	Task	Activ	Description	Hours	Amount
12/23/24	DV	B250B		Meeting to discuss CGA and response to bondholder counsel re: cy pres.	.60	237.00
12/23/24	DMM	B250B		Research on creditor's ability to claim endowed/restricted funds under NY law.	.70	276.50
12/23/24	DMM	B250B		Review of CGA agreements and research on charitable gift annuities and email to J. Milite and D. Parise re: same.	.60	237.00
12/23/24	DMM	B250B		Call w/ B. Pollack and D. Vespia re: request from Mintz Levin re: endowment funds.	.50	197.50
12/23/24	DP	B250B		Research charitable gift annuities and creditor rights.	3.50	1,382.50
12/23/24	JM	B250B		Research treatment of charitable gift annuities in bankruptcy.	4.80	1,896.00
12/24/24	BLP	B250B		Finalize and send email regarding restricted endowments with spreadsheet of same to BHs	.30	244.50
12/24/24	MGR	B250B		Review revised Cy pres petition and discuss comments.	.50	435.00
12/24/24	DV	B250B		Reviewed memo re: CGA.	.30	118.50
12/24/24	DV	B250B		Emails re: correspondence to bondholder counsel re: restricted endowment (.2); reviewed memo re: CGA (.3).	.50	197.50
12/24/24	DMM	B250B		Reviewing and commenting on email to Mintz Levin re: nature of endowment funds.	.30	118.50
12/24/24	DMM	B250B		Reviewing research on CGA funds in bankruptcy.	.60	237.00
12/24/24	DP	B250B		Continue research on charitable gift annuities and assignability of charitable gift annuities.	4.60	1,817.00
12/24/24	JM	B250B		Research tax implications of assignment of CGAs.	2.20	869.00
12/30/24	BLP	B250B		Several comms re BH further questions on endowment issues	.40	326.00
12/30/24	MGR	B250B		Review emails concerning bond holders requests concerning cy pres petition and discuss internally.	.50	435.00
12/30/24	DV	B250B		Emails re: meeting w/ bondholders' counsel to discuss status of restricted endowment.	.60	237.00



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Date	Atty	Task	Activ	Description	Hours	Amount
1/02/25	DV	B250B		Meetings w/ D. Mitacek to discuss draft cy pres petition and response to bondholder questions re: same.	.60	237.00
1/02/25	DMM	B250B		Mtg w/ D. Vespia to discuss bondholder request re: endowment funds.	.40	158.00
1/04/25	DV	B250B		Emails w/ B. Pollack re: Summit inquiries re: endowment/CGA funds.	.30	118.50
1/06/25	BLP	B250B		Comms with DV and DM re endowment issues in preparation of call with BHs re same	.70	570.50
1/06/25	BLP	B250B		Call with BHs re questions on endowment funds, cy pres	.30	244.50
1/06/25	DV	B250B		Telephone call w/ B. Pollack and D. Mitacek re: bondholder request for endowment information	.50	197.50
1/06/25	DV	B250B		Meeting w/ bondholder counsel to discuss same	.60	237.00
1/06/25	DMM	B250B		Call w/ B. Pollack and D. Vespia to prep for call w/ Bondholder's counsel	.80	316.00
1/06/25	DMM	B250B		Call w/ Bondholder's counsel re: endowment and cy press	.50	197.50
1/07/25	DMM	B250B		Drafting the cy pres petition.	3.50	1,382.50
1/08/25	DMM	B250B		Continuing to draft cy pres petition.	2.10	829.50
1/09/25	KM	B250B		Attention to requested endowment fund transfer in connection with preparing Cy Pres application, including emails with client and original donor and his counsel.	.60	237.00
1/09/25	DMM	B250B		Continuing to draft cy pres petition	5.10	2,014.50
1/09/25	DMM	B250B		Call w/ K. McDonough re: Second Chance Scholarship fund	.20	79.00
1/10/25	KM	B250B		Emails with CFO at the College and with founding donor of Second Chance Scholarship Fund regarding status and timing of distributions.	.50	197.50
1/10/25	DV	B250B		Emails w/ D. Polley and D. Mitacek re: data for schedule to petition (.4); reviewed same (.2).	.60	237.00

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Date	Atty	Task	Activ	Description	Hours	Amount
1/10/25	DMM	B250B		Continuing to draft cy pres petition	1.70	671.50
1/10/25	DMM	B250B		Call w/ D. Vespia re: information needed from College for petition	.20	79.00
1/13/25	BLP	B250B		Review chart re endowment accounts, rational for transfers (.3); comms with DV and DM re same and cy pres (.2)	.50	407.50
1/13/25	BLP	B250B		Meeting with DV and DM re endowments, cy pres, pension issues	.70	570.50
1/13/25	DV	B250B		Reviewed updated exhibit re: endowments	.30	118.50
1/13/25	DV	B250B		Meeting w/ D. Mitacek and B. Pollack to discuss same	.50	197.50
1/13/25	DMM	B250B		Call w/ B. Pollack and D. Vespia re: cy pres	.50	197.50
1/13/25	DMM	B250B		Continuing drafting cy pres petition	1.10	434.50
1/14/25	BLP	B250B		Review and preliminary comments on cy pres petition	.80	652.00
1/14/25	DV	B250B		Attention to draft cy pres petition.	.40	158.00
1/14/25	DMM	B250B		Continuing to draft cy pres.	1.30	513.50
1/15/25	BLP	B250B		Comms with DV re outcome of cy pres hearing for email to AG (.2); review email to AG re same (.2)	.40	326.00
1/15/25	DV	B250B		Attention to draft update to Assistant Attorney General re: cy pres petition	.50	197.50
1/15/25	DV	B250B		Email to AAG re: cy pres (.2); email to M. White re: same (.1).	.30	118.50
1/15/25	DMM	B250B		Reviewing and commenting on draft email to AG re: status of cy pres	.20	79.00
1/15/25	DMM	B250B		Preparing Exhibit A - Chart of Restricted Funds - to attach to cy pres	1.60	632.00
1/16/25	DMM	B250B		Continuing to revise Exhibit A - Chart of Restricted Funds. Email to D. Vespia w/ questions re: certain funds not included in chart.	1.80	711.00
1/21/25	BLP	B250B		Review and revise draft of cy pres motion	.40	326.00
1/21/25	BLP	B250B		Call with DV and DM re cy pres issues	.30	244.50

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Date	Atty	Task	Actv	Description	Hours	Amount
1/21/25	DV	B250B		Reviewed and revised cy pres petition	2.10	829.50
1/21/25	DV	B250B		Reviewed B. Pollack comments to same (.3); emails w/ D. Mitacek re: same (.2).	.50	197.50
1/21/25	DMM	B250B		Call w/ B. Pollack and D. Vespia re: open issues related to cy pres	.60	237.00
1/21/25	DMM	B250B		Preparing draft of Exhibit A to cy pres petition	1.10	434.50
1/22/25	BLP	B250B		Comms with DV re cy pres petition, costs, service	.30	244.50
1/22/25	DV	B250B		Emails w/ D. Mitacek and B. Pollack re: cy pres petition.	.40	158.00
1/22/25	DMM	B250B		Attention to question re: administrative fees for cy press	.20	79.00
1/22/25	DMM	B250B		Continuing preparation of Exhibit A to petition	1.00	395.00
1/23/25	DV	B250B		Reviewed draft Exhibit A (.3); email to client re: same (.2).	.50	197.50
1/23/25	DV	B250B		Revised and finalized draft cy pres petition	.90	355.50
1/23/25	DMM	B250B		Updating draft of cy pres petition to correct information re: transfers to Maria College.	.50	197.50
1/24/25	DV	B250B		Emails w/ M. White re: response to donor re: transfer of fund; emails w/ D. Polley and D. Mitacek re: trust agreement.	.40	158.00
1/27/25	DV	B250B		Reviewed comments to cy pres petition	.30	118.50
1/27/25	DV	B250B		Emails w/ D. Mitacek re: same	.20	79.00
1/27/25	DV	B250B		Emails w/ M. White re: response to donor re: transfer of fund	.30	118.50
1/28/25	DV	B250B		Emails w/ M. White re: response to donor re: status of fund transfer.	.20	79.00
1/28/25	DMM	B250B		Reviewing and responding to comments to cy pres petition	.80	316.00
1/28/25	DMM	B250B		Reviewing and revising Chart of Restricted Funds	1.90	750.50
1/29/25	DV	B250B		Attention to draft response to donor	.50	197.50
1/29/25	DV	B250B		Emails w/ M. White re: same	.20	79.00

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Date	Atty	Task	Activ	Description	Hours	Amount
1/29/25	DV	B250B		Email to donor	.10	39.50
1/29/25	DV	B250B		Attention to exhibit to cy pres petition	.70	276.50
1/29/25	DMM	B250B		Reviewing and revising Chart of Restricted Funds to be attached to cy pres petition	.90	355.50
1/30/25	DV	B250B		Meeting w/ D. Mitacek to discuss petition and treatment of CGAs; attention to correspondence re: same.	.70	276.50
1/30/25	DMM	B250B		Attention to question of how to address CGA funds in the cy pres petition	.90	355.50
1/30/25	DMM	B250B		Reviewing Oulette Trust documents and email to D.Vespia re: CSR's rights as a beneficiary	.30	118.50
1/31/25	DMM	B250B		Attention to charitable gift annuity research.	.40	158.00
1/31/25	DA	B250B		Conducted phone call with partner to discuss refining research and initial findings.	.20	56.00
1/31/25	DA	B250B		Research on what happens to charitable gift annuities when their donee charity declares bankruptcy.	4.50	1,260.00
<b>TASK SUB TOTAL</b>						<b>\$ 50,728.50</b>

**B260B PENSION PLAN/PBGC ISSUES**

Date	Atty	Task	Activ	Description	Hours	Amount
10/14/24	DV	B260B		Emails w/ J. Knapp and B. Diaz re: lump sum requests and communications to participants.	.20	79.00
10/15/24	DV	B260B		Telephone call w/ B. Diaz re: PBGC matters (.3); emails w/ J. Knapp re: same (.2)	.50	197.50
10/15/24	BD	B260B		Discussions re plan termination and payouts.	1.30	513.50
10/16/24	BD	B260B		Attention to plan matters	.50	197.50
10/17/24	BD	B260B		Communicate with Markella Roma to discuss plan issues.	.70	276.50
10/21/24	BLP	B260B		Comms re PBGC requests for information	.30	244.50

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Date	Atty	Task	Actv	Description	Hours	Amount
10/21/24	DV	B260B		Emails w/ B. Diaz re: pension plan distributions (.2) emails w/ B. Diaz and B. Pollack re: PBGC information requests (.2)	.40	158.00
10/21/24	BD	B260B		Attention to plan termination matters (.4); communications with JK, PBGC, Milliman and others regarding outstanding PBGC requests and other matters (.3)	.70	276.50
10/22/24	BD	B260B		Communication with PBGC re plan termination matters.	.20	79.00
10/23/24	BLP	B260B		Conference with KC re motion to make pension distributions	.30	244.50
10/23/24	KC	B260B		Research re: motions for authority to make distributions from terminated pension plan and property of the estate issues.	3.30	1,353.00
10/24/24	BD	B260B		Analyze/review relevant regs to respond to client questions re termination and plan distributions. including Conference with Milliman.	1.50	592.50
10/25/24	KC	B260B		Drafting motion for authority to liquidate pension plans.	2.50	1,025.00
10/28/24	BLP	B260B		Conference with DV re pension plan distributions, issues with PBGC	.40	326.00
10/28/24	BLP	B260B		Work on motion to permit distributions from plan	1.00	815.00
10/28/24	BLP	B260B		Call with client re pension plan	.50	407.50
10/28/24	DV	B260B		Meeting w/ B. Pollack to discuss motion re: pension plan	.30	118.50
10/28/24	DV	B260B		Meeting to discuss administration of plan	.50	197.50
10/28/24	DV	B260B		Emails w/ J. Knapp re: motion	.20	79.00
10/28/24	BD	B260B		Call with client to discuss plan termination issues.	.50	197.50
10/29/24	BLP	B260B		Prepare letter to pension plan participants re distributions from plan	.30	244.50
10/30/24	BLP	B260B		Comms re pension plan payments under ERISA	.30	244.50
10/30/24	DV	B260B		Attention to emails re: payment options for plan participants.	.20	79.00

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Date	Atty	Task	Actv	Description	Hours	Amount
10/31/24	BLP	B260B		Several comms with DV/B. Diaz re pension distributions and rules re same, motion	.50	407.50
10/31/24	DV	B260B		Emails re: pension plan termination matters; discussion w/ B. Pollack re: same	.30	118.50
11/01/24	BD	B260B		Attention to plan issues/discussion with Milliman re plan termination and other misc.	.70	276.50
11/04/24	BLP	B260B		Discussion with DV re pension plan distributions, questions re same	.20	163.00
11/04/24	DV	B260B		Meeting re: PBGC information requests.	.50	197.50
11/04/24	BD	B260B		Attention to plan termination matters(.2); call with St Rose to discuss information request from PBGC (.3)	.50	197.50
11/04/24	BD	B260B		Respond to PBGC regarding same	.30	118.50
11/07/24	DP	B260B		Begin researching Pension Benefit Guaranty Corporation regulations regarding lump sum payments following a bankruptcy filing.	.60	237.00
11/08/24	BLP	B260B		Comms re discussions with PBGC re payments from pension plan, issues re same	.30	244.50
11/08/24	DV	B260B		Telephone call w/ B. Pollack re: pension plan motion	.20	79.00
11/08/24	DV	B260B		Emails w/ B. Pollack and B. Diaz re: payments to plan participants	.50	197.50
11/08/24	DV	B260B		Reviewed D. Parise research re: same	.50	197.50
11/08/24	DP	B260B		Research cases regarding Public Benefit Guaranty Corporation issues	1.20	474.00
11/11/24	BD	B260B		Communication with client re (.3); Communication with PBGC re plan termination issues information request and other matters (.2)	.50	197.50
11/12/24	DV	B260B		Attention to email re: plan participant payments.	.20	79.00
11/13/24	BLP	B260B		Comms re PBGC issues	.20	163.00
11/13/24	DV	B260B		Emails w/ J. Knapp re: letter to plan participants.	.20	79.00
11/13/24	BD	B260B		Communications with client and PBGC re information request.	.70	276.50

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Date	Atty	Task	Actv	Description	Hours	Amount
11/14/24	BLP	B260B		Call with PBGC re pension plan termination, underfunding, ability to make distributions from plan	.40	326.00
11/14/24	DV	B260B		Meeting w/ PBGC re: PK termination issues.	.50	197.50
11/14/24	BD	B260B		Call with PBGC to discuss plan termination matters.	.50	197.50
11/17/24	BLP	B260B		Revise letter to pension plan participants re status of plan and ability to get distributions	.20	163.00
11/18/24	BLP	B260B		Conference with DV/BD re pension on issues of property of estate	.50	407.50
11/19/24	BLP	B260B		Review revisions to letter to pension plan participants	.20	163.00
11/19/24	DV	B260B		Reviewed and revised notice to plan participants (.3); email to B. Pollack re: same (.1).	.40	158.00
11/21/24	BLP	B260B		Multiple discussions with counsel to Key Bank re distributions from pension plan and CGA distributions and payments	.50	407.50
11/26/24	BLP	B260B		Work on motion re pension plan and review research re same	1.80	1,467.00
11/29/24	BLP	B260B		Revise Pension motion re payments to Milliman from plan	.30	244.50
12/02/24	BLP	B260B		Comms with client and DV re pension motion and changes to same	.30	244.50
12/04/24	BLP	B260B		Revise pension plan motion and email to client and tax attorney for review	.40	326.00
12/04/24	BLP	B260B		Review client and tax comments to pension motion and further comms re same	.40	326.00
12/04/24	BD	B260B		Attention to pension plan matters/bankruptcy motion filing.	.30	118.50
12/05/24	BLP	B260B		Comms with DV, client re comments to pension plan motion	.30	244.50
12/05/24	BLP	B260B		Continued work on pension motion for client comments	.70	570.50
12/06/24	BLP	B260B		Comms re information for pension motion and revise same	.50	407.50

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Date	Atty	Task	Actv	Description	Hours	Amount
12/17/24	BLP	B260B		Call with PBGC re involuntary termination, waterfall re sale distributions	.60	489.00
12/17/24	DV	B260B		Telephone call w/ B. Pollack re: same.	.20	79.00
12/17/24	DV	B260B		Meeting w/ PBGC re: plan termination.	.50	197.50
12/17/24	BD	B260B		Call with PBGC to discuss plan termination and real estate sale issues.	.50	197.50
12/19/24	DV	B260B		Emails w/ K. Owens re: plan termination documents.	.20	79.00
1/02/25	BD	B260B		Review/analyze PBGC response to motion	.20	79.00
1/03/25	DV	B260B		Reviewed PBGC filing	.50	197.50
1/03/25	DV	B260B		Emails w/ B. Pollack re: same (.2); emails w/ B. Pollack re: KeyBank trust request re: motion (.3).	.50	197.50
1/09/25	BLP	B260B		Review response by PBGC to pension motion and comms with B. Diaz re same	.50	407.50
1/10/25	BLP	B260B		Review comments of Key Bank to pension order and comms with DV re same	.50	407.50
1/10/25	BLP	B260B		Revise additional ordered provisions requested by KeyBank and email to client for review	.30	244.50
1/10/25	BLP	B260B		Review comments of B. Diaz to PBGC pleading	.30	244.50
1/10/25	DV	B260B		Attention to pension plan termination matters	.50	197.50
1/10/25	BD	B260B		Provided responses to PBGC's motion answer (for BP)	1.00	395.00
1/13/25	BLP	B260B		Comms with Key Bank re proposed changes to pension order	.30	244.50
1/14/25	BLP	B260B		Call with Key Bank re pension order and negotiation of changes to same	.30	244.50
1/14/25	DV	B260B		Conference call w/ B. Pollack and counsel for KeyBank re: pension plan order and status of cy pres	.40	158.00
1/14/25	DV	B260B		Telephone call w/ B. Pollack re: same (.2); emails w/ counsel for KeyBank re: same (.2).	.40	158.00
1/16/25	DV	B260B		Emails w/ PBGC counsel re: status of plan termination documents.	.20	79.00



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Date	Atty	Task	Actv	Description	Hours	Amount
1/17/25	BLP	B260B		Comms re KeyBank requests re pension plan payments	.20	163.00
1/17/25	DV	B260B		Emails re: KeyBank request for plan termination information.	.30	118.50
1/28/25	DV	B260B		Attention to notice to pension plan participants	1.20	474.00
1/28/25	DV	B260B		Emails w/ B. Diaz re: same	.30	118.50
1/28/25	BD	B260B		Revise/redraft college notice to participants re plan distributions	1.20	474.00
1/29/25	DV	B260B		Attention to notice to plan participants	.60	237.00
1/29/25	DV	B260B		Emails w/ B. Diaz re: same	.30	118.50
1/29/25	DV	B260B		Emails w/ client re: same	.20	79.00
1/29/25	DV	B260B		Reviewed comments to same	.20	79.00
1/29/25	BD	B260B		Review/finalize draft notice to participants re bankruptcy filing.	.50	197.50

**TASK SUB TOTAL**

**\$ 23,974.00**

**B270B EMPLOYMENT MATTERS**

Date	Atty	Task	Actv	Description	Hours	Amount
10/17/24	BLP	B270B		Participate in executive committee meeting regarding employment issues, filing, process, hearings, sale, and strategy in case	1.80	1,467.00
10/17/24	BLP	B270B		Conference with RR and DV re employment issues	.40	326.00
10/17/24	DV	B270B		Telephone call w/ B. Pollack re: Employees compensation matters;	.30	118.50
10/17/24	DV	B270B		Employees compensation matters; reviewed materials re: same; email to J. Stone re: same	.20	79.00
10/17/24	DV	B270B		Email to J. Stone re: employment matters;	.20	79.00
10/17/24	DV	B270B		Emails w/ J.Knapp and B. Selchick re. appointment letters	.50	197.50

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Date	Atty	Task	Actv	Description	Hours	Amount
10/18/24	DV	B270B		Emails w/ B. Pollack and M. Roseman re: employee letters	.40	158.00
10/18/24	DV	B270B		Telephone calis w/ B. Pollack re: employee letters	.30	118.50
10/18/24	DV	B270B		Revised draft letters	.30	118.50
10/18/24	DV	B270B		Emails w/ B. Selchick re: revised letters	.20	79.00
10/18/24	DV	B270B		Emails w/ J. Knapp re: draft letters	.20	79.00
10/18/24	DV	B270B		Drafted employee letters	.70	276.50
11/07/24	DV	B270B		Emails w/ J. Knapp and B. Selchick re: employment matter.	.20	79.00
11/12/24	DV	B270B		Telephone call w/ S. Harding re: employment contract extensions.	.30	118.50
11/13/24	MGR	B270B		Prepare for EC meeting and Discuss timeline w/ D Vespia to be presented at EC meeting.	.50	435.00
11/15/24	DV	B270B		Emails w/ B. Selchick re: contract extensions; drafted same.	.60	237.00
11/17/24	DV	B270B		Attention to emails re: employee benefits.	.30	118.50
11/18/24	DV	B270B		Attention to contract extensions.	1.20	474.00
11/18/24	DV	B270B		Emails w/ B. Pollack and M. Roseman re: same.	.20	79.00
11/18/24	DV	B270B		Emails W/ M. White and J. Stone re: same.	.20	79.00
11/18/24	RG	B270B		Draft employment extension agreement for D. Polley.	.80	316.00
11/19/24	BLP	B270B		Review contract extension agreement and comms re same	.30	244.50
11/19/24	DV	B270B		Prepared contract amendment.(.4); emails w/ J. Stone re: same (.1).	.50	197.50
11/19/24	DV	B270B		Emails w/ M. White re: contract extensions (.3); revised same (.2)	.50	197.50
11/22/24	DV	B270B		Emails w/ B. Pollack and M. Roseman re: employment contracts (.2); emails w/ B. Pollack and M. Roseman re: UST information request (.1).	.30	118.50

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Date	Atty	Task	Actv	Description	Hours	Amount
11/25/24	BLP	B270B		Discussion with DV re contract extensions for employees	.20	163.00
11/26/24	BLP	B270B		Further conferences re employment contract extensions	.30	244.50
11/26/24	MGR	B270B		Conf w/ B Pollack and D Vespia regarding employment extensions and related issues concerning end date and potential admin claims.	.50	435.00
11/26/24	DV	B270B		Meeting w/ M. Roseman and B. Pollack to discuss employment matters.	.30	118.50
11/26/24	DV	B270B		Finalized extension letters (.3); email to M. White re: same (.1);	.40	158.00
12/01/24	BLP	B270B		Comms with UST re retention payments	.20	163.00
12/10/24	DV	B270B		Telephone calls and emails w/ B. Selchick and B. employee contract extension.	.40	158.00
12/10/24	DV	B270B		Prepared draft extension (.4); email to M. White re: same (.1).	.50	197.50
12/17/24	BLP	B270B		Comms re extension of President contract, provisions of same	.30	244.50
12/17/24	DV	B270B		Telephone call w/ B. Pollack re: contract extension.	.30	118.50
12/17/24	DV	B270B		Revised draft extension in connection w/ same.	.70	276.50
12/17/24	DV	B270B		Email to J. Stone re: same.	.30	118.50
12/20/24	DV	B270B		Attention to contract extension (.2); emails w/ J. Stone re: same (.2); email to D. Meyers re: same (.2).	.60	237.00
12/22/24	DV	B270B		Attention to proposed modifications to extension (.2); email to B. Pollack re: same (.1).	.30	118.50
12/23/24	BLP	B270B		Review proposed changes to M. White contract and comms re same	.40	326.00
12/23/24	MGR	B270B		Review proposed changes to presidents contract and e-mail issues with requests.	.60	522.00
12/23/24	DV	B270B		Attention to proposed revisions to contract extension.	.40	158.00
12/23/24	DV	B270B		Email to MW counsel re: same (.3); email to J. Stonere: same (.2).	.50	197.50

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Date	Atty	Task	Actv	Description	Hours	Amount
12/27/24	DV	B270B		Email to D. Meyers re: contract extension.	.20	79.00
12/30/24	MGR	B270B		Internal discussions regarding modifications to Presidents contract	.50	435.00
12/30/24	DV	B270B		Attention to emails re: employee termination (.2); emails re: contract extension (.2).	.40	158.00
1/06/25	DV	B270B		Attention to Kessler extension	.20	79.00
1/09/25	BLP	B270B		Comms re M. White contract and payments thereunder	.20	163.00
1/09/25	DV	B270B		Emails w/ D. Meyers re: contract extension.	.20	79.00
1/16/25	DV	B270B		Telephone call w/ D. Polley re: contract extension	.20	79.00
1/27/25	DV	B270B		Emails w/ Kessler re: contract extention	.10	39.50
1/27/25	DV	B270B		Emails w/ M. White re: contract extension	.20	79.00
1/27/25	DV	B270B		Prepared extension	.20	79.00
1/30/25	BLP	B270B		Comms re J. Richardson salary, contract	.20	163.00
1/30/25	DV	B270B		Emails and telephone call w/ M. White re: employee compensation	.30	118.50
1/30/25	DV	B270B		Emails w/ D. Meyers re: contract extension	.20	79.00
1/30/25	DV	B270B		Emails w/ M. Roseman and B. Pollack re: same	.20	79.00
1/31/25	DV	B270B		Emails re: employee compensation matter.	.20	79.00
<b>TASK SUB TOTAL</b>						<b>\$ 11,533.00</b>

**B310B RECORDS RETENTION**

Date	Atty	Task	Actv	Description	Hours	Amount
10/24/24	BLP	B310B		Comms re record retention agreement with UA	.20	163.00
10/24/24	DV	B310B		Email to B. Pollack re: UA record retention agreement.	.20	79.00
11/19/24	BLP	B310B		Work on record retention motion	1.40	1,141.00
11/19/24	BLP	B310B		Conferences re Iron Mountain, record retention issues	.40	326.00

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Date	Atty	Task	Actv	Description	Hours	Amount
11/19/24	DV	B310B		Meeting w/ B. Pollack re: document storage contract (.2); emails w/ L. Thomson and D. Polley re: same (.3).	.50	197.50
1/08/25	BLP	B310B		Review of record retention spreadsheet from client	.50	407.50
1/13/25	DV	B310B		Attention to record retention schedule and correspondence re: same	.40	158.00
1/13/25	DV	B310B		Telephone call w/ B. Pollack re: same	.30	118.50
1/23/25	BLP	B310B		Call with client re record retention, access agreement issues	1.30	1,059.50
1/23/25	DV	B310B		Meeting to discuss record retention and related motion	1.30	513.50
1/23/25	DV	B310B		Emails w/ J. Richardson re: record retention requirements (.2); emails w/ B. Pollack re: same (.2).	.40	158.00
1/24/25	DV	B310B		Attention to Ferilli proposal.	.20	79.00
<b>TASK SUB TOTAL</b>						<b>\$ 4,400.50</b>
<b>TOTAL PROFESSIONAL SERVICES</b>						<b>\$ 584,660.50</b>

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# **SUMMARY OF PROFESSIONAL SERVICES**

Name	Hours	Rate	Total
BONNIE L. POLLACK	361.00	815.00	294,215.00
KEVIN MCDONOUGH	4.80	395.00	1,896.00
MATTHEW G ROSEMAN	171.50	870.00	149,205.00
ANDREW NITKEWICZ	3.10	395.00	1,224.50
DINA VESPIA	189.50	395.00	74,852.50
DEIRDRE M MITACEK	41.50	395.00	16,392.50
RYAN SOEBKE	.80	395.00	316.00
DANIEL PARISE	18.10	395.00	7,149.50
JORDAN MILITE	7.00	395.00	2,765.00
CHRISTOPHER E BUCKEY	8.80	395.00	3,476.00
DANA APRIGLIANO	4.70	280.00	1,316.00
BOZENA DIAZ	12.30	395.00	4,858.50
MICHAEL S ENG	20.10	640.00	12,864.00
KYRIAKI CHRISTODOULOU	25.60	410.00	10,496.00
RYAN GOLDBERG	9.20	395.00	3,634.00
<b>Total</b>	<b>878.00</b>		<b>\$ 584,660.50</b>

## **DISBURSEMENTS**

### **E106 ON-LINE RESEARCH**

Date	Task	Description	Amount
10/11/24	E106	U.S. COURTS: PACER, ON-LINE RESEARCH (E106), INV#2 522345-Q32024 DTD 10/07/2024 ELECTRONIC RECORDS	140.10
10/25/24	E106	ON-LINE RESEARCH (E106), CHRISTODOULOU,KYRIAKI, ON-LINE RESEARCH (E106), CHRISTODOULOU,KYRIAKI, INV# 3095341196	12.78
10/25/24	E106	ON-LINE RESEARCH (E106), CHRISTODOULOU,KYRIAKI, ON-LINE RESEARCH (E106), CHRISTODOULOU,KYRIAKI, INV# 3095341196	5.68
11/20/24	E106	ON-LINE RESEARCH (E106), CHRISTODOULOU,KYRIAKI, ON-LINE RESEARCH (E106), CHRISTODOULOU,KYRIAKI, INV# 3095390222	12.96
11/20/24	E106	ON-LINE RESEARCH (E106), CHRISTODOULOU,KYRIAKI, ON-LINE RESEARCH (E106), CHRISTODOULOU,KYRIAKI, INV# 3095390222	6.51
11/20/24	E106	ON-LINE RESEARCH (E106), CHRISTODOULOU,KYRIAKI, ON-LINE RESEARCH (E106), CHRISTODOULOU,KYRIAKI, INV# 3095390222	8.14
12/18/24	E106	ON-LINE RESEARCH (E106), CHRISTODOULOU,KYRIAKI, ON-LINE RESEARCH (E106), CHRISTODOULOU,KYRIAKI, INV# 3095444219	4.95

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12/18/24	E106	ON-LINE RESEARCH (E106), CHRISTODOULOU,KYRIAKI, ON-LINE RESEARCH (E106), CHRISTODOULOU,KYRIAKI, INV# 3095444219	14.86
12/18/24	E106	ON-LINE RESEARCH (E106), CHRISTODOULOU,KYRIAKI, ON-LINE RESEARCH (E106), CHRISTODOULOU,KYRIAKI, INV# 3095444219	13.21
12/18/24	E106	ON-LINE RESEARCH (E106), CHRISTODOULOU,KYRIAKI, ON-LINE RESEARCH (E106), CHRISTODOULOU,KYRIAKI, INV# 3095444219	11.49
<b>SUB TOTAL</b>			<b>\$ 230.68</b>

**E107 DELIVERY SERVICES/MESSENGER**

Date	Task	Description	Amount
10/31/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 57-14987 DTD 10/21/2024 SENT TO: NYS DEPT. OF ENVI RONMENTAL ON 10/10/24 BP/MR	41.20
10/31/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 57-14987 DTD 10/21/2024 SENT TO: US DEPT. OF EDUCA TION- FEDERAL STUDENT AID ON 10/10/24 BP/MR	41.20
10/31/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 57-14987 DTD 10/21/2024 SENT TO: ATTY. GENERAL OF THE STATE ON 10/10/24 BP/MR	41.20
10/31/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 57-14987 DTD 10/21/2024 SENT TO: US DEPT. OF EDUCA TION ON 10/10/24 BP/MR	55.05
10/31/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 57-14987 DTD 10/21/2024 SENT TO: NYS HIGHER ED. SE RVICES CORP. ON 10/10/24 BP/MR	41.20
10/31/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 57-14987 DTD 10/21/2024 SENT TO: US SECURITIES AN D EXCHANGE COMMISSION ON 10/10/24 BP/MR	41.20
10/31/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 57-14987 DTD 10/21/2024 SENT TO: SS ADMIN- BANKRUPTCY ON 10/10/24 BP/MR	77.55
10/31/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 57-14987 DTD 10/21/2024 SENT TO: NYS EDUCATION DEP T. ON 10/10/24 BP/MR	41.20
10/31/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 57-14987 DTD 10/21/2024 SENT TO: UNITED PROFESSION AL SERVICES ON 10/10/24 BP/MR	41.20
10/31/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 57-14987 DTD 10/21/2024 SENT TO: MANUFACTURES AND TRADERS- TRUST COMPANY ON 10/10/24 BP/MR	41.20
10/31/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 57-14987 DTD 10/21/2024 SENT TO: GREAT AMERICAN IN SURANCE COMPANY ON 10/10/24 BP/MR	55.05
10/31/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 57-14987 DTD 10/21/2024 SENT TO: GREEN STREET ON 10/10/24 BP/MR	41.20

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Date	Task	Description	Amount
10/31/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 57-14987 DTD 10/21/2024 SENT TO: HARTFORD FIRE INSURANCE COMPANY ON 10/10/24 BP/MR	41.20
10/31/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 57-14987 DTD 10/21/2024 SENT TO: TWIN CITY FIRE INSURANCE COMPANY ON 10/10/24 BP/MR	41.20
10/31/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 57-14987 DTD 10/21/2024 SENT TO: DEPT. OF VETERANS AFFAIRS ON 10/10/24 BP/MR	55.05
10/31/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 57-14987 DTD 10/21/2024 SENT TO: INDIAN HARBOR INSURANCE COMPANY ON 10/10/24 BP/MR	41.20
10/31/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 57-14987 DTD 10/21/2024 SENT TO: GREAT AMERICAN INSURANCE GROUP ON 10/10/24 BP/MR	41.20
10/31/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 57-14987 DTD 10/21/2024 SENT TO: UNITED EDUCATORS INSURANCE ON 10/10/24 BP/MR	55.05
10/31/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 57-14987 DTD 10/21/2024 SENT TO: RSUI GROUP INC ON 10/10/24 BP/MR	68.30
10/31/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 57-14987 DTD 10/21/2024 SENT TO: AT-BAY INSURANCE COMPANY ON 10/10/24 BP/MR	90.80
10/31/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 57-14987 DTD 10/21/2024 SENT TO: ARTHUR GALLAGHER RISK IN 10/10/24 BP/MR	41.20
10/31/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 57-14987 DTD 10/21/2024 SENT TO: FREBERG ENVIRONMENTAL INC ON 10/10/24 BP/MR	68.30
10/31/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 57-14987 DTD 10/21/2024 SENT TO: US BANKRUPTCY COURT ON 10/10/24 BP/MR	16.18
10/31/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 57-14987 DTD 10/21/2024 SENT TO: GREAT LAKES INSURANCE ON 10/11/24 BP/MR	25.11
10/31/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 57-14987 DTD 10/21/2024 SENT TO: WESTFIELD SPECIALTY INSURANCE ON 10/11/24 BP/MR	16.18
10/31/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 57-14987 DTD 10/21/2024 SENT TO: CERTAIN UNDERWRITERS AT LLOYDS ON 10/11/24 BP/MR	20.75
10/31/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 57-14987 DTD 10/21/2024 SENT TO: KINSALE INSURANCE COMPANY ON 10/11/24 BP/MR	19.15
10/31/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 57-14987 DTD 10/21/2024 SENT TO: ASPEN SPECIALTY COMPANY ON 10/11/24 BP/MR	16.18
10/31/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 57-14987 DTD 10/21/2024 SENT TO: ARCH SPECIALTY ON 10/11/24 BP/MR	16.18
10/31/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 57-14987 DTD 10/21/2024 SENT TO: LANDMARK AMERICAN INSURANCE ON 10/11/24 BP/MR	27.04



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10/31/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 57-14987 DTD 10/21/2024 SENT TO: BRIDGEWAY INSURANCE COMPANY ON 10/11/24 BP/MR	16.18
11/06/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 63-22031 DTD 10/28/2024 SENT TO: AXA DIVISION- GREENWICH INSURANCE ON 10/11/24 BP/MR	16.18
11/06/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 63-22031 DTD 10/28/2024 SENT TO: JAMES FOLEY U.S. COURTHOUSE ON 10/17/21 BP/MR	21.89
11/06/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 63-22031 DTD 10/28/2024 SENT TO: JAMES FOLEY U.S. COURTHOUSE ON 10/18/24 BP/MR	16.22
11/06/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 63-22031 DTD 10/28/2024 SENT TO: CANON FINANCIAL SERVICES ON 10/22/24 BP/MR	68.30
11/06/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 63-22031 DTD 10/28/2024 SENT TO: CITY OF ALBANY- CAPITAL RESOURCE ON 10/22/24 BP/MR	55.05
11/06/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 63-22031 DTD 10/28/2024 SENT TO: UNITED STATES TRUSTEES FOR REGIONS ON 10/22/24 BP/MR	41.20
11/06/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 63-22031 DTD 10/28/2024 SENT TO: SUMMITBRIDGE NATIONAL- INVESTMENTS VII LLC ON 10/22/24 BP/MR	68.30
11/06/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 63-22031 DTD 10/28/2024 SENT TO: EVERSHEDS SUTHERLAND ON 10/22/24 BP/MR	68.30
11/06/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 63-22031 DTD 10/28/2024 SENT TO: MONTZ LEVIN COHEN FERRIS ON 10/22/24 BP/MR	41.20
11/06/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 63-22031 DTD 10/28/2024 SENT TO: FIRSTLIGHT ON 10/22/24 BP/MR	55.05
11/06/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 63-22031 DTD 10/28/2024 SENT TO: MARK'S ORGANIC PEEL CONTROL ON 10/22/24 BP/MR	41.20
11/06/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 63-22031 DTD 10/28/2024 SENT TO: TMA SYSTEMS ON 10/22/24 BP/MR	68.30
11/06/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 63-22031 DTD 10/28/2024 SENT TO: USHERWOOD OFFICE TECHNOLOGY ON 10/22/24 BP/MR	55.05
11/06/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 63-22031 DTD 10/28/2024 SENT TO: U.S. SECURITIES AND EXCHANGE COMMISSION ON 10/22/24 BP/MR	41.20
11/06/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 63-22031 DTD 10/28/2024 SENT TO: ATTORNEY GENERAL- STATE OF NY ON 10/22/24 BP/MR	41.20
11/06/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 63-22031 DTD 10/28/2024 SENT TO: DEPT. OF VETERAN'S AFFAIRS ON 10/22/24 BP/MR	55.05
11/06/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 63-22031 DTD 10/28/2024 SENT TO: O'CONNELL & ARONOWITZ ON 10/22/24 BP/MR	41.20

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11/06/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 63-22031 DTD 10/28/2024 SENT TO: EVERSHEDES SUTHERLAND LLP ON 10/22/24 BP/MR	41.20
11/06/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 63-22031 DTD 10/28/2024 SENT TO: PENSION BENEFIT GUARANTY CORP. ON 10/22/24 BP/MR	55.05
11/06/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 63-22031 DTD 10/28/2024 SENT TO: LEMERY GREISLER LLC ON 10/22/24 BP/MR	41.20
11/06/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 63-22031 DTD 10/28/2024 SENT TO: MONTZ, LEVIN, COHEN FERRIS ON 10/22/24 BP/MR	41.20
11/06/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 63-22031 DTD 10/28/2024 SENT TO: LEMERY GREISLER LLC ON 10/22/24 BP/MR	55.05
11/06/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 63-22031 DTD 10/28/2024 SENT TO: CHAM. OF THE HON. ROBERT LITTLEFIRE JAMES T. FOLEY U.S. COURTHOUSE ON 10/22/24 BP/MR	21.84
11/06/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#2-324-20047 DTD 10/29/2024 SENT TO: I-WAVE INFORMATION SYSTEMS, INC BP/MR	46.00
11/21/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 85-46315 DTD 11/18/2024 SENT TO: B. POLLACK ON 11. 7.24, TM	17.38
11/21/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 78-12499 DTD 11/11/2024 SENT TO: B. POLLACK ON 11. 5.24, TM	24.24
11/21/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-6 78-12499 DTD 11/11/2024 SENT TO: B. POLLACK ON 11. 6.24, TM	17.38
11/27/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-670-24224 DTD 11/04/2024 SENT TO: SOUTHWEST MARINE ON 10/11/24 BP/MR	32.56
11/27/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-670-24224 DTD 11/04/2024 SENT TO: JAMES FOLEY ON 11/01/24 BP/MR	24.19
11/27/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-670-24224 DTD 11/04/2024 SENT TO: SMPR TITLE AGENCY ON 11/06/24 BP/MR	22.96
11/27/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-670-24224 DTD 11/04/2024 SENT TO: MELISSA HUNTING ON 11/06/24 BP/MR	42.11
11/27/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-670-24224 DTD 11/04/2024 SENT TO: MELISSA 11/07/24 BP/MR	32.54
11/27/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-670-24224 DTD 11/04/2024 SENT TO: SMPR TITLE AGENCY 11/07/24 BP/MR	17.38
11/27/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-670-24224 DTD 11/04/2024 SENT TO: MELISSA HUNTING 11/08/24 BP/MR	32.54
11/27/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-670-24224 DTD 11/04/2024 SENT TO: SMPR TITLE AGENCY 11/08/24 BP/MR	17.38
11/27/24	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-670-24224 DTD 11/04/2024 SENT TO: JAMES FOLEY 11/08/24 BP/MR	17.38
1/08/25	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV# 8-718-80065 DTD 12/23/24 SENT TO: JAMES T FOLEY 12/16/24 BP/MR	18.54

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1/17/25	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-7 25-92578 DTD 12/30/2024 SENT TO: CITY OF ALBANY 12 /23/24 BP/MR	18.54
<b>SUB TOTAL</b>			<b>\$ 2,706.45</b>

**E108 POSTAGE**

Date	Task	Description	Amount
10/10/24	E108	POSTAGE 10/10/2024, SK/BP	480.00
10/11/24	E108	POSTAGE 10/11/2024, SK/BP	32.00
10/16/24	E108	POSTAGE 10/16/2024, BP/SK	207.45
10/17/24	E108	POSTAGE 10/18/2024, BP/SK	141.75
10/22/24	E108	POSTAGE 10/22/2024, SK/BP	474.30
10/22/24	E108	POSTAGE 10/22/2024, SK/BP	.69
10/23/24	E108	POSTAGE 10/23/2024, SK/BP	26.49
11/08/24	E108	POSTAGE 11/08/2024, SK/BP	184.23
12/06/24	E108	POSTAGE 12/06/2024, SK/BP	17.94
12/11/24	E108	POSTAGE 12/11/2024, SK/BP	497.30
1/22/25	E108	POSTAGE 01/22/2025, BP/SK	462.40
<b>SUB TOTAL</b>			<b>\$ 2,524.55</b>

**E111 MEALS**

Date	Task	Description	Amount
12/20/24	E111	BRIAN FITZGERALD, MEALS, Breakfast catering order for St. Rose Auction	208.71
12/20/24	E111	BRIAN FITZGERALD, MEALS, Maurice's lunch service for 18	242.39
<b>SUB TOTAL</b>			<b>\$ 451.10</b>

**E112 COURT FEES**

Date	Task	Description	Amount
10/28/24	E112	CSC, COURT FEES INV#86117028566 DTD 09/05/2024 FOR FEES RE: BANKRUPTCY FILING KM/MR	148.00
10/30/24	E112	CHASE CARD SERVICES CONFRIM #7888212581 DTD 11/10/2024 FOR: DOCUMENTS- @ U.S. BANKRUPTCY COURT ON 10/10/24 BP/MR	1,738.00
11/26/24	E112	CHASE CARD SERVICES, COURT FEES, CONFRIM #7972406145, DTD 12/10/2024 FOR US BANKRUPTCY COURT ON 10/16/24 BP/MR	199.00
11/26/24	E112	CHASE CARD SERVICES, COURT FEES, CONFRIM #7972406145, DTD 12/10/2024 FOR MOTION @ US BANKRUPTCY COURT ON 10/22/27 CR/MR	398.00

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Date	Task	Description	Amount
11/26/24	E112	CHASE CARD SERVICES, COURT FEES, CONFRIM #7972406145, DTD 12/10/2024 FOR FILING RECORDS @ NY BANKRUPTCY COURT ON 11/07/24 CR/MR	34.00
12/30/24	E112	CHASE CARD SERVICES, COURT FEES CONFRIMATION #8036072273, DTD 01/10/2025 FOR FILINGS @ NY BANKRUPTCY COURT ON 12/06/24 CR/MR	68.00
SUB TOTAL			\$ 2,585.00

**E115 DEPOSITIONS**

Date	Task	Description	Amount
1/07/25	E115	VERITEXT, DEPOSITION TRANSCRIPTS, INV#7976200 DTD 12/30/2024 FOR TRANSCRIPT RE: THE COLLEGE OF SAINT ROSE BANKRUPTCY FILING CR/MR	193.05
1/14/25	E115	VERITEXT, DEPOSITION TRANSCRIPTS, INV#7984492 DTD 01/03/2025 FOR TRANSCRIPT RE: BANKRUPTCY FILING CR/MR	1,486.40
SUB TOTAL			\$ 1,679.45
TOTAL DISBURSEMENTS			\$ 10,177.23
TOTAL THIS INVOICE			\$ 594,837.73



Cullen and Dykman LLP  
The Omni Building  
333 Earle Ovington Blvd, 2<sup>nd</sup> Floor  
Uniondale, NY 11553  
T: 516.357.3700  
F: 516.357.3792  
Tax ID: 11-0658700

THE COLLEGE OF SAINT ROSE  
432 WESTERN AVENUE  
ALBANY, NY 12203

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## REMITTANCE

File Number: 22484-000-3

Control Number 7504731

RE: BANKRUPTCY FILING

BALANCE DUE THIS INVOICE

\$ 594,837.73

Please return this page with payment to:

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333 Earle Ovington Blvd, 2nd Floor  
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**Wire Transfer Instructions:**

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270 Park Avenue  
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Account # : 530-931-915  
ABA # : 021000021  
SWIFT Code: CHASUS33

For Credit To:  
CULLEN & DYKMAN LLP  
Operating Account  
333 Earle Ovington Blvd, 2nd Floor  
Uniondale, NY 11553

**TERMS: NET 30 DAYS**

**Exhibit G**

**Disbursement Summary**

<b>Disbursement</b>	<b>Total</b>
Filing Fees	\$2,585.00
Overnight Mail	\$2,706.45
On-Line Research/PACER	\$230.68
Transcripts	\$1,679.45
Postage	\$2,524.55
Meals (Auction)	\$451.10
<b>TOTAL:</b>	<b>\$10,177.23</b>